

# STATE OF COLORADO

## DRAFT 2007-2008 STRATEGIC ACTION PLAN



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# Third Program Year Action Plan Narrative Responses

## GENERAL

### Executive Summary

The 2007 Action Plan describes how Colorado will allocate and use funds from the U.S. Department of Housing and Urban Development (HUD) to serve our communities.

The Action Plan formally amends the state's 2005-2010 Consolidated Plan. Upon approval by HUD, DOLA receives funding distributed by formula under the state Community Development Block Grant (CDBG), Emergency Shelter Grant (ESG), HOME Investment Partnership, and Housing Opportunities for Persons With AIDS (HOPWA) programs. The Action Plan complies with updated federal reporting requirements found in 24CFR part 91 and 570, as amended.

The Department of Local Affairs (DOLA), the Divisions of Housing (CDH), Local Government (DLG) and Governor's Office of Economic Development and International Trade (OEDIT) are grateful to HUD for the opportunity to administer these funds on behalf of our partner jurisdictions and local organizations that implement projects funded by HUD and other partners across the State of Colorado.

#### ANTICIPATED RESOURCES

DOLA receives a variety of federal and state resources to meet the state's housing and community development priorities. These housing, community development and economic development resources are linked together to secure maximum benefit to clients. Federal and state resources are leveraged with those of local jurisdictions and non-public funds to maximize cost efficiency and to stretch the public dollar.

The table below highlights HUD funding, and the table on page 7 lists all major federal, state and local housing, community and economic development resources that DOLA anticipates may contribute to the goals and objectives listed in this plan.

HUD Formula Funds Administered by the Department of Local Affairs, Division of Housing ( CDH)		Estimated Amount
Home Investment Partnership Funds (HOME)		\$8,884,025
ADDI Funds		\$167,509
Emergency Shelter Grant (ESG)		\$1,018,277
Community Development Block Grant (CDBG)		\$10,564,875
Housing Opportunities for Persons with AIDS (HOPWA)		\$364,000

## DOLA Organization

The four HUD formula programs are administered within three divisions as listed below. Under the authority of DOLA's Director, the divisions coordinate the administration and annual reporting of these HUD funds for the state.

Division of Housing	Division of Local Government	Office of Economic Development and International Trade
1/3 CDBG	1/3 CDBG	1/3 CDBG
HOME		
ESG		
HOPWA		

## PERFORMANCE OUTCOME MEASURES

Performance Measurement is a new and important feature of the consolidated planning process. HUD has established broad goals and objectives to assist in both the planning and measurement processes.

### HUD Statutory Program Goals

1. Decent housing
2. A suitable living environment
3. Expanded economic opportunity

Funded activities must also address at least one of the following objectives:

- Availability/accessibility
- Affordability
- Sustainability

DOLA will link the appropriate HUD goal and objective, identify the applicable HUD Outcome Statement, and collect data on specific performance indicators for each funded activity and report performance in the Consolidated Annual Performance Evaluation Report (CAPER) in June 2007.

## Strategic Plan Strategies, Goals, Objectives and Outcomes

Strategy	Priority	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
(1) Preserve the existing supply of affordable rental housing	High	Decent Housing	Availability	Accessibility for the purpose of providing decent housing	# units of existing affordable rental housing preserved
(2) Increase the supply of affordable rental housing to meet community needs	High	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	# new rental units are constructed
(3) Increase the capacity and stability of local housing and service providers	Medium	Decent Housing	Sustainability	Accessibility for the purpose of providing decent housing	# CHDOs with increased capacity through CHDO Operating Grants.
(4) Increase home ownership for low/moderate-income households and minorities	Medium	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	# new homeownership opportunities
(5) Maintain homeownership for low- and moderate-income households and minorities	High	Decent Housing	Availability	Accessibility for the purpose of providing decent housing	# low/moderate-income households retaining homeownership through rehab  # of households receiving foreclosure prevention assistance
(6) Meet community needs for homeless shelter beds and supportive services	High	Suitable Living Environment	Availability	Accessibility for the purpose of providing decent housing	# homeless and transitional housing beds
(7) Assist in creating an adequate supply of housing for persons with special needs coupled with services that increase independence	High	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	Number of special needs units coupled with services  Number of persons with HIV/AIDS maintaining housing stability  Number of HIV/AIDS clients w/ improved access to HIV treatment

(8) Provide community at large and policy-maker education and outreach on housing issues so that communities are better able to meet their housing needs.	High	Decent Housing	Sustainability	Sustainability for the purpose of providing decent housing	Number of policy-makers attending outreach and training events
(9) Provide financial and technical assistance to businesses to create or retain jobs.	High	Expanded Economic Opportunity	Sustainability	Sustainability for the purpose of creating economic opportunities	Number of jobs
(10) Help improve the leadership and governing capacities of Colorado communities.	High	Creating a Suitable Living Environment	Sustainability	Sustainability for the purpose of creating suitable living environments	Number of communities represented in training sessions
(11) Help Colorado communities identify, prioritize and address their capital improvement needs.	High	Creating a Suitable Living Environment	Sustainability	Sustainability for the purpose of creating suitable living environments	Number of persons served as a result of the public facility improvements or construction

Data on outcome indicators will also be collected from each project selected for funding. HUD has identified five common indicators for each CDBG-funded activity:

1. Funds leveraged
2. Number of persons, households, housing units assisted
3. Income levels
4. Number of communities assisted
5. Current racial/ethnic and disability categories

HUD has identified 17 other indicators to be used depending on the CDBG-funded activity and its intent. To collect the applicable indicator data and meet the HUD performance measures system requirements, CDH programs have taken the following steps:

1. Improve performance measurement data collection system so that it integrates with HUD's Integrated Disbursement Information System (IDIS), including:
  - Grant application forms
  - Grant contracting documents
  - Quarterly Reports
  - Project Performance Reports
  - Grant closeout forms
2. Assess training needs on performance measure reporting for grantee and sub recipients
3. Collect and enter new performance measurement data into IDIS on existing contracts.

## **SUMMARY OF PLAN CHANGES**

(1) For program year 2007, HUD requires all formula grantees to implement the new performance measurement system. This plan will incorporate those new data collection and reporting requirements.

(2) The ESG program will implement a new competitive process.

## **Evaluation of Past Performance**

The Colorado Division of Housing (CDH) provided many tools in the past year to create and preserve units of affordable housing in Colorado. These tools included workshops designed to build capacity among nonprofit housing developers, workshops to promote appropriate implementation of HUD regulation; training that enables grantees to maximize program effectiveness and funding to projects that meet our underwriting requirements.

The housing market flattened substantially during the period of late 2001 to 2006, resulting in higher-than-normal vacancy rates in most regions. This market climate created many issues for nonprofit housing development organizations. Some projects experienced insufficient cash flows and were at risk of foreclosure. By closely examining housing market conditions, CDH was able to implement tools to assist these projects: (1) utilized outside consultants to assess troubled properties and make recommendations for appropriate action, including refinancing, rehabilitation, and reconfiguring nonprofit portfolios; (2) provided technical assistance to increase capacity of Community Housing Development Organizations (CHDOs) and other housing providers; and (3) collaborated with Colorado Housing and Finance Authority (CHFA) to create a team approach to saving troubled properties.

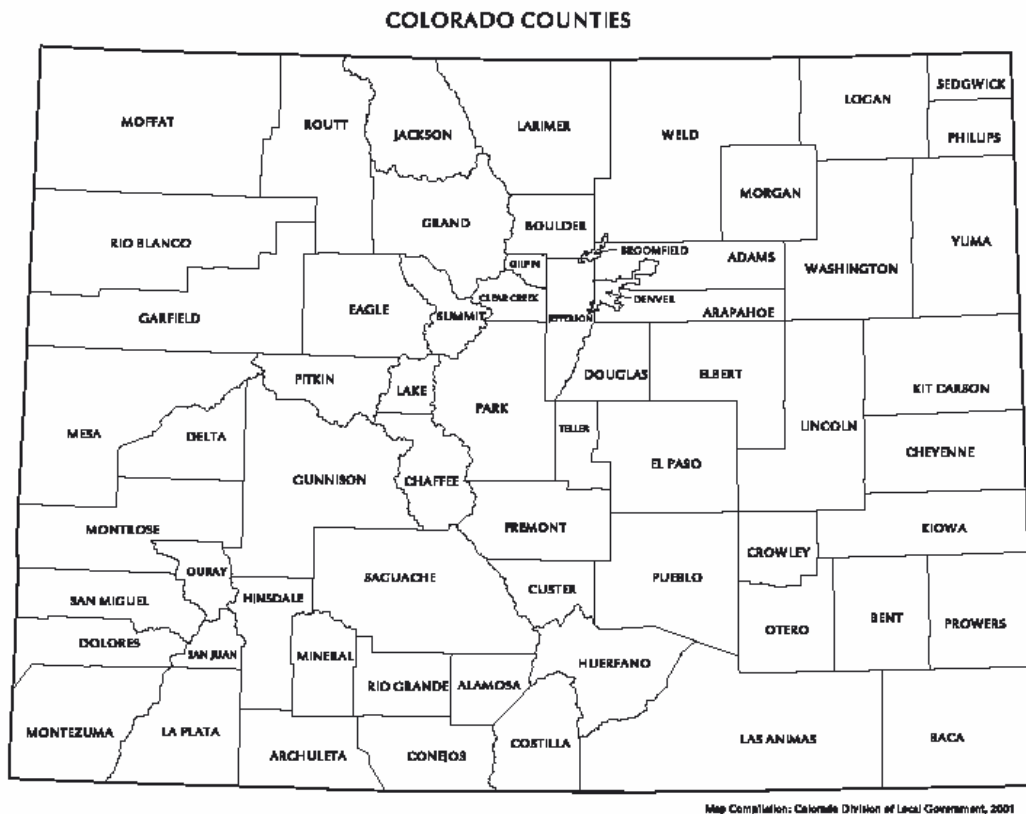
The Division emphasized stabilization, rehabilitation and refinancing of existing projects and opportunities to add existing market rate projects to the affordable housing inventory.

At the same time, the CDH worked to increase the agency capacity of homeless shelters and homeless service providers that assist families and individuals in need, worked to prevent homelessness and identified the need for a statewide program to prevent foreclosures.

## Geographic Areas

### 1. Describe The geographic areas of the jurisdiction where assistance will be directed in the next year.

Colorado provides direct assistance to all geographic areas of the State (see map below), prioritizing families <30% of Area Median Income and includes areas of racial/minority concentration. Please see state map below



### Basis for Allocating Investments and Assigning Priorities

#### 2. Describe the basis for allocating investments geographically within the jurisdiction during the next year and rationale for assigning the priorities.

The State of Colorado elects to distribute HOME funding through a continuous application process across the entire state. CDBG funding will also be allocated continuously across the state except for CDBG entitlements. CDH may distribute CDBG funds for homeless shelters in entitlement areas because we find that the homeless do not have an address. ESG will be funded through a competitive application process with a goal of geographic equity. The basis for allocating HOPWA investments geographically within the Colorado during the next year is in proportion to the occurrence of HIV/AIDS in each of the four non-HOPWA entitlement regions as compared to the total HIV/AIDS non-entitlement population. The four areas are defined as: the Western Slope (West-CAP), the Northern Front Range, (N-CAP); Southern Colorado (SCAP); and Boulder County (B-CAP). This allocation was used because HOPWA service agencies determined this to be a fair, equitable and consistent way to assign HOPWA dollars, and it is needs-based.



## Neighborhood Revitalization Areas

There are **no Neighborhood Revitalization Areas** or Target Areas in this Plan.

## Addressing the Obstacles to Meeting Needs of the Underserved

### 3. Describe actions to address obstacles to meeting underserved needs.

The Division has taken the lead in funding programs that can become models for communities throughout Colorado. Because the Division's funding is primarily discretionary, it is used as the catalyst for other supportive housing efforts. The Division of Housing can finance hard assets such as housing construction or rehabilitation, or soft costs such as rental subsidies. The direct impact of housing development is quality housing and additional construction jobs for a community.

Colorado Housing and Finance Authority (CHFA) is also exploring ways to provide low-interest and no-interest loans for housing development that serves families at 30% of AMI. CDH and CHFA, as well as other funding agencies, often coordinate their efforts in order to make affordable housing projects successful. CHFA and CDH are also working in a collaborative manner to preserve affordable housing projects that have experienced financial issues due to the economic slow down, resultant vacancy issues and intense market competition.

CDH received \$1,000,000 in Housing Development Grant funds for State fiscal year 2006. It is unknown to what extent the state legislature will allocate such funding in the future. When available, these state funds are the most flexible of the Division's funding, and allow tailored community solutions to help ensure that the poorest families in Colorado have an increasing supply of rental units affordable to them.

CDH believes that supportive services linked to housing are key to assisting families in escaping poverty. State agencies and organizations, including (CDH), Supportive Housing and Homeless Programs (SHHP) and the Colorado Interagency Council on Homelessness work to better link housing and services for low-income residents and homeless persons. Job training, education, employment, childcare, transportation, housing and food stamp benefits will assist poverty-stricken families in achieving economic self-sufficiency.

A primary housing program that is designed to reduce dependency on public assistance is the Section 8 Family Self-Sufficiency (FSS) program. The Division also operates a Housing Choice Voucher Special Needs Program to coordinate organizations that provide supportive services. Five hundred disabled families receive rental assistance through independent living centers. Sixty families receive assistance through the Colorado AIDS project; and 100 families in the Families Unification Program receive rental assistance, as well as 167 families who are homeless or at the risk of being homeless.

## Federal, State and Local Resources

### 4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan.

The table below lists those resources most commonly utilized by housing, community development and economic development projects. Those agencies appearing on this list are **potential** partners or funders at federal, state and local levels. Many programs offer a variety of services that cross categories.

Estimated Federal Resources	
HOME Program	\$8,482,282
Emergency Shelter Grant (ESG)	\$1,018,277
Community Development Block Grant	\$11,120,921
Housing Opportunities for Persons with AIDS (HOPWA)	\$ 364,000
Section 8 Housing Choice Voucher	\$18,283,328
Low Income Housing Assistance Program	\$ 341,852
McKinney Vento Homeless Assistance (SHP)	\$12,000,000
Metropolitan Denver Homeless Initiative CoC	\$9,151,949
Homeward Pikes Peak CoC	\$1,166,800
Balance of State CoC	\$2,045,474
Community Services Block Grant	
Estimated State Resources	
Housing Development Grant	\$1,000,000
Housing Rehabilitation Revolving Loan Fund	\$3,109,500
Mineral and Energy Impact Grants	
Estimated "Other Resources"	
Local Governments	\$10,000,000
Nonprofit Sector Contributions to Projects	\$ 3,109,500
Private Sector Contributions to Projects	\$ 5,000,000
Colorado Trust-administered State Tax Check-off for Homeless Prevention	\$ 200,000

## MANAGING THE PROCESS

### Lead Agency

#### 1. Identify the lead agency, entity and agencies responsible for administration.

The Department of Local Affairs (DOLA), Division of Housing (CDH) is the lead agency responsible for administering Consolidated Plan programs for HOME, ESG and HOPWA, and CDH shares responsibility with the Division of Local Government and Office of Economic Development and International Trade for administration CDBG.

## Process

### **2. Identify significant aspects of the process by which the plan was developed, and agencies, groups, and organizations who participated .**

The Annual Action Plan (Strategic Plan) was developed as follows:

- (1) Assessed the current economic, social, housing and infrastructure climates and inventorying current programs in light of those conditions.
- (2) Identified unmet needs of targeted households, determined goals and brainstormed strategies that CDH could employ to address those needs.
- (3) Developed a draft framework of activities to accomplish the strategies. Concurrent, with this step, CDH began to gather input and consult with other State agencies, including those organizations outlined below.

#### CONSULTATION

- Colorado Civil Rights Division—Fair Housing Issues
- Faith-based Organizations
- Colorado Department of Human Services (DHS), Supportive Housing and Homeless Programs Division (SHHP),
- Colorado Housing and Finance Authority (CHFA),
- State of Colorado Housing Board,
- Community Housing Development Organizations (CHDOs),
- Colorado Aids Project,
- Colorado Interagency Council on Homelessness,
- Colorado Continuums of Care (CoCs);
- Colorado Coalition for the Homeless (CCH);
- nonprofit service providers.

- (4) CDH incorporated input and feedback, then readied the draft document for Public Hearings held in Grand Junction and Denver.

## Actions to Enhance Coordination

### **3. Describe actions that will take place during the next year to enhance coordination with public/private housing, health, and social service agencies.**

CDH will facilitate interagency strategies that coordinate housing, health and social service activities of various public and private agencies and create knowledge and awareness of the Consolidated Plan and Action Plan.

- ❖ The Housing “Pipeline”, which includes development staff from CDH, the Colorado Housing and Finance Authority (CHFA), Mercy Housing Southwest, the USDA Rural Development (RD), the Department of Housing and Urban Development (HUD), Mile High Loan Fund and Funding Partners. CDH helps facilitate this group on a quarterly basis to identify common ground, common projects and issues of mutual interest.
- ❖ The Blue Ribbon Panel on Housing published its recommendations in 2005 and began a statewide process to create broad-based community consensus building. The panel included the real estate community; business; the housing finance community; state and local government; higher education; faith-based organizations; homeless service organizations; and providers of public and private housing. Ongoing efforts are needs assessments and research on a housing trust fund.
- ❖ The Colorado Interagency Council on Homelessness is a coordinating body appointed by the Governor, to develop a strategic approach to ending homelessness. The Council includes representatives of the Governor’s Office;

Colorado Departments of Local Affairs; Human Services; and Institutions and appropriate sub-agency leaders, Colorado Coalition for the Homeless, Veterans Administration, Social Security Administration, businesses, private foundations, homeless housing and service agencies and homeless persons. Two statewide homeless counts will result in increased collaboration with all levels of government.

- ❖ Continuums of Care (CoCs) are broad-based, community coordinating organizations that carry out activities and design permanent supportive housing, transitional housing and service components that reduce chronic and family homelessness, promote self-sufficiency. CDH will coordinate with the CoCs to fund appropriate housing and shelter projects. These CoCs are: Metropolitan Denver Homeless Initiative (the seven counties in the Denver MSA), Homeward Pikes Peak (El Paso County); and the Balance of State CoC (includes the remaining 56 counties). Housing Colorado, Inc. is a 501(c)(3) membership organization composed of private- and public-sector housing development agencies, housing authorities, service providers, state and local agencies that provides monthly workshops on housing issues, a housing conference, newsletter and other activities that link and coordinate diverse organizations and interests. CDH will continue to participate in organization.
- ❖ Colorado Chapter, National Association of Housing Redevelopment Organizations (NAHRO) is a statewide trade association for housing authorities and redevelopment agencies. NAHRO sponsors an annual conference which brings together housing officials, service providers and private-sector businesses. CDH will continue its active membership in this organization.

## **Citizen Participation Plan**

### **1. Provide a summary of the citizen participation process.**

#### **CONSULTATION**

The State consulted with public and private agencies that provide housing, health, social, public infrastructure improvements, economic development, and other identified services to persons of low and moderate income, as well as agencies that provide services to persons with AIDS, and agencies that provide services to chronically homeless persons. This included the Colorado Interagency Council on Homelessness, Colorado Coalition for the Homeless, Supportive Housing and Homeless Programs, Continuums of Care and service providers.

DOLA also notified units of general local governments of the planning process to solicit their input into it. CDH contacted the Colorado Civil Rights Division, Colorado Coalition for the Homeless, Freddie Mac, Fannie Mae and HUD staff regarding Fair Housing issues and findings that may impede Fair Housing. These consultations are in preparation for an in-depth analysis of Impediments to Fair Housing that will occur beginning in January, 2007.

Through our Blue Ribbon Panel, Round Tables and Community Forums, CDH has solicited input about community needs and goals and objectives identified in this plan. Additionally, the State works directly with faith-based organizations regarding the topics of homelessness and affordable housing. These organizations include Mercy Housing, Volunteers of America, Catholic Charities, Housing Justice!, Stepping Stones, Cooperating Ministries, Ministerial Alliances, Interfaith Hospitality Network organizations and others.

## **PUBLIC HEARINGS**

Two sets of public hearings will obtain citizens' views. The hearings will be held at two different locations. At least one hearing will be held on the Eastern Slope and one on the Western Slope. The hearings will take comment on proposed one-year actions.

A public notice will be published in a newspaper of general circulation throughout the state at least ten (10) days prior to such public hearing. A copy of the public notice will be sent to the various organizations from which the state sought consultation. The state will provide accommodation for the handicapped upon request. Where a significant number of non-English speaking residents can be reasonably expected to participate, arrangements will be made to have an interpreter present.

The state will accept written comments up to fifteen (15) days from the date of each hearing. These comments will be a part of the state's consolidated planning process.

## **PUBLIC INFORMATION AND ACCESS TO RECORDS**

Information and records regarding the proposed use of the HUD funding sources will be available at the Department of Local Affairs, 1313 Sherman Street, Room 518, Denver, Colorado during regular office hours, 8am to 5pm Monday through Friday, except holidays. Copies of the proposed plan will also be posted in DOLA field offices.

Northeastern area office in Sterling, vacant  
Southeastern area office in Pueblo, (719) 544-6577  
South Central office in Monte Vista, (719) 852-9429  
Southwestern office in Durango, (970) 247-7311  
Northwestern office in Grand Junction, (970) 248-7310  
Northern Mountains office in Silverthorne, vacant  
North Central office in Loveland, (970) 679-4501  
Central office in Denver, (303) 866-3688.

Please call (303) 866-2771 or TDD (303) 866-5300 for the location of the DOLA field office nearest you or you may contact the field office directly. Alternate formats of the citizen participation plan will be made available to persons upon request.

## **AMENDMENTS**

The DOLA will amend its consolidated plan when there is a new proposed activity that was not included in the adopted plan, or there is a change in the method of distribution.

## **WRITTEN COMMENTS AND COMPLAINTS**

The state will respond to comments, complaints and grievances in a timely manner. When practicable, such responses shall be made within fifteen (15) working days and included in the consolidated plan. Please address your comments, complaints, or grievances to:

Consolidated Plan Staff  
DOLA, Room 518  
1313 Sherman Street  
Denver, CO 80203

# STATE OF COLORADO

## 2007-2008 ACTION PLAN

### Institutional Structure

1. Describe actions during the next year to develop institutional structure.

#### 1. State of Colorado, Department of Local Affairs.

**Division of Housing** coordinates the state's affordable housing efforts and works to foster cooperation between private enterprise and local, state and federal governments. Its goal is to facilitate construction, acquisition and rehabilitation of affordable housing units, particularly for lower income households. The Division is responsible for enforcement of the federal Manufactured Home Construction and Safety Standards for all manufactured homes built in the state. It provides both technical assistance and direct financial support to local governments and non-profit agencies through the following programs:

- ❖ State Housing Development Grant Program;
- ❖ State Revolving Loan Fund;
- ❖ Federal "Small Cities" Community Development Block Grant Housing Program;
- ❖ Federal Home Investment Partnership Program;
- ❖ Private Activity Bond Program;
- ❖ Federal Permanent Housing for the Handicapped Homeless Program;
- ❖ Emergency Shelter Grant Program (ESG);
- ❖ Housing Opportunities for Persons with AIDS (HOPWA)

The Community Housing Assistance Section staff is assigned specific regions of the state, and field offices are located in Grand Junction and Pueblo. This section assists local communities in identifying housing needs, including the type, cost, location and number of units needed in the community and works with community to create a housing development project team that can help secure private and public funding for the housing project.

In addition, the Division of Housing manages the statewide balance of Private Activity Bond allocation, which is accessed by application to the Department of Local Affairs. A Bond Allocation Committee of eight members appointed by the Governor reviews applications and advises the Executive Director on specific allocation proposals.

The **State Housing Board**, whose seven members are appointed by the Governor, serves as an advisory unit to CDH and the Governor. The Board meets monthly to review and recommend funding on housing applications for the various programs administered by the Division, passes regulations for manufactured structures, and adopts building codes for multifamily housing in counties with no codes.

**Division of Local Government (DLG)** administers three programs that directly and indirectly affect statewide housing efforts.

- ❖ The *Energy and Mineral Impact Assistance* program provides grants for the planning, construction and maintenance of public facilities and the provision of public services. Loans, in addition to grants, are available for water and wastewater projects. Eligible recipients are municipalities, counties, school districts, special districts and other political subdivisions socially or economically

impacted by the development, processing or energy conversion of minerals and mineral fuels.

- ❖ The "*Small Cities*" *Community Development Block Grant* program, which provides grants for public facility projects.
- ❖ The Department designates certain economically-distressed areas of the state as *Enterprise Zones*. Businesses may qualify for special state tax incentives to encourage job creation/investment in these zones.

DLG also functions as the outreach arm of the department. The staff, located in the eight field areas, work with local clients to define needs; identify and develop response capacity; coordinate the delivery of department services; provide follow-up with evaluation of services and project effectiveness; and serve as advocate for both local government clients and for department agencies.

Denver-based staff works to build independent local government capacity through a variety of general government and community development services and provides or arranges some financing.

- ❖ *Technical Services*, in coordination with Field Services, provides a broad range of specialized technical assistance, training, and published materials to enhance administrative capabilities for local governing entities. These services include budgeting and financial management; capital improvement and land use planning; purchasing; environmental matters; water and sewer financing and operations; and financial capacity research and analysis.
- ❖ *Demography* provides demographic and economic information, assistance and coordination to public and private organizations. Services include all decennial census data; general and special population estimates and projections; cooperative programs with the U.S. Bureau of the Census; and special economic and demographic analysis.

## State of Colorado, Department of Human Services.

**Mental Health Services** provides public mental health services for persons with serious mental illness, delivering those services through contracts with six specialty clinics and 17 private, nonprofit community mental health centers. Services include inpatient treatment, emergency services, case management, in-home family preservation, day services, residential support services, peer/family support, and public education. Two state mental health institutes at Pueblo and Fort Logan provide inpatient hospitalization for Colorado residents with serious mental illness. These institutions are part of the integrated public mental health system with policy direction and program, monitoring provided by the Division of Mental Health. Mental Health Assessment and Services Agencies (MHASAs) are also a component of Colorado's public mental health system.

**Developmental Disabilities Services** provides services and support through state-operated Regional Centers and 26 Community Center Boards (CCBs). The Regional Centers provide 24-hour residential services in the "most restricted setting in the continuum of residential services", as well as medical, vocational, and educational services. The CCBs are private, nonprofit organizations located throughout the state whose functions include: needs assessments, planning, service coordination, and service/supports from approved agencies. The Division provides services to people



with developmental disabilities that include case management, residential services, day program services, and family services and supports.

**Youth Services** administers and contracts with private providers for statewide services for juveniles aged 10 to 21 years of age who have demonstrated delinquent behavior. These providers serve youth in both institutional and community settings.

**Supportive Housing and Homeless Programs (SHHP)** is a statewide housing agency that operates within the Colorado Department of Human Services, Office of Behavioral Health and Housing. SHHP's rental assistance programs provide Section 8 assistance to families and individuals with special needs, including mental and physical disabilities. Certificates and vouchers are passed through to 60 local community service providers who provide supportive services to the households. SHHP also administers special rental assistance programs including the Single Room Occupancy Moderate Rehabilitation Program, the Veterans Affairs Supportive Housing Program and a Shelter Plus Care program. They are also active in finding homeownership opportunities for disabled persons.

## **Colorado Housing and Finance Authority (CHFA)**

Is an independent, self-sustaining establishment with nearly \$3 billion in assets which sells bonds enabling it to provide financing for single-family mortgages to qualifying homebuyers and facilitates development of multi-family apartment units for low- and moderate-income residents. CHFA also makes loans to Colorado-owned small and medium-sized businesses and also administers the Low Income Housing Tax Credit Program.

## **Local Governments or Regional Quasi-Public Organizations**

The Division of Housing works closely with local governments and Councils of Governments (COG) to deliver housing assistance. Many homeowner rehabilitation programs and down payment assistance programs are administered regionally through one local government or COG. CDH engages local governments in analyzing regulatory costs associated with housing development by publishing reports and conducting trainings for staff. CDH also publishes *Housing Colorado: A guide for local officials*, a manual distributed to local governments to provide tools that can reduce regulatory burden for affordable housing.

## **Nonprofit Organizations**

Nonprofit housing development and service agencies exist in many Colorado communities. Some serve a single locale; others serve a whole region. Since 1991, the Division of Housing has worked with local communities to create regional Community Housing Development Organizations (CHDOs) and local and regional housing authorities. CDH works with these housing authorities, CHDOs, and regional nonprofit organizations during all steps of the development process, from identifying housing demand to putting together financing packages to managing lease up. CDH continues to work with these partners on new projects and to strengthen existing nonprofit organizations by providing training that increases their capacity, stability, participation and independence.

## **Foundations**

There are many foundations with programs to fund the development of housing and housing-related services. CDH staff is aware of those foundations that are apt to fund various types of housing projects, and staff members have developed a



technical brief on Foundations and Corporate Giving to help our nonprofit partners access foundation funds.

The Colorado Association of Realtors Housing Opportunity Fund (CARHOF) assists housing projects. Funds come from local boards of realtors and are distributed statewide for defined purposes. CDH has produced an Advance on the CARHOF funds to ensure that all funds are utilized statewide. CARHOF distributes funds for a variety of projects, including housing.

## **Private Industry**

This group includes corporations, commercial banks, savings and loans, mortgage companies, credit unions, and pension funds as well as the construction and real estate industry. Colorado has a high level of participation from developers and homebuilders around the issue of affordable housing. These groups came together to support an increase in the level of state funding to the Division of Housing for the Housing Development Grant program. Local banks have begun providing long term financing to housing projects in their areas, some with more flexible loan terms.

## Institutional Structure — Non-Housing State of Colorado, Department of Local Affairs

**Division of Local Government (DLG)** administers programs which directly or indirectly affect statewide efforts: the *Energy and Mineral Impact Assistance (IA)* Program, the *"Small Cities" Community Development Block Grant (CDBG)*, the *Community Services Block Grant (CSBG)*, the *Local Government Gaming Impact Fund*, *Waste Tire Program*, *Conservation Trust Fund (CTF)*, and the *Search and Rescue Fund*.

Regional field managers function as the marketing arm of the department for the non-housing community development needs of the state. The staff is located in eight regional offices and work with local clients to define their needs; to identify and develop response capacity; coordinate the delivery of the department's non-housing services; provide follow-up with evaluation of services and project effectiveness; and serve as advocate for both local government clients and for department agencies.

Given the various goals of the programs, the IA and CDBG programs have a statewide multi-purpose design. The other five programs have a very specific clientele and will only be mentioned casually throughout this discussion. The IA and CDBG programs operate open-competitive grant programs. The IA program may offer loans, but only for very specific water and sewer purposes. By design, no loans are offered through the CDBG program. All applications for IA or CDBG funding are reviewed by the regional field staff members who prepare the staff evaluation for each application. Providing input into the staff review process are numerous state agencies:

Solid Waste & Landfill	Office of Energy Conservation Local Government Department of Health
Drinking Water/Treatment	Local Government Department of Health
Sewer/Wastewater/Sludge	Local Government Department of Health
Flood Control/Drainage	Colorado Water Conservation Board
Hazardous Material/Emergency Warning	Division of Emergency Services
Education, Distance Learning	Department of Education
Historical	Department of Higher Education/Historic Preservation
Aviation	Department of Transportation
Parks & Recreation	Department of Natural Resources

A listing of all applications is shared with USDA Rural Development for the purpose of determining its interest in working with DLG on a particular project/s. Except in emergency situations, all IA applications for funding are reviewed by the State Impact Assistance Advisory Committee that makes recommendations to the Executive Director of the Department of Local Affairs. Applications for CDBG are reviewed by staff members, who make recommendations to the Executive Director for funding.

The Department is represented on numerous boards and advisory groups. Of particular note is the intergovernmental Water and Sewer Needs Committee, which is

composed of state and federal agencies normally concerned with sewer and water issues. The Committee is made up of the Colorado Municipal League, Special District Association of Colorado, Colorado Counties, Inc., USDA Rural Development, Colorado Rural Water Association, and the Colorado Water Resources and Power Authority. Coordination is provided through DLG.

## **The Office of Economic Development and International Trade (OEDIT)**

has the purpose of retaining Colorado's existing businesses, helping them expand, encouraging out-of-state companies with good quality paying jobs to locate to Colorado, and of assisting persons or entities starting businesses in the state. The mission of OEDIT is to provide effective, professional assistance to the state's business community and to local communities; to make essential information easily accessible to business owners throughout the state; to promote the development and expansion of minority businesses; to offer state job training, marketing, and assistance programs to every region of the state; and to encourage new businesses, business retention, expansion and relocation resulting in the retention or creation of Colorado jobs. OEDIT includes: Business Development, Business Finance, Small Business Development Centers, Economic Development Commission, Governor's Financial Review Committee, Venture Capital Authority, Minority Business Office, Tourism, Research and Special Projects and International Trade and Council on the Arts.

**The Governor's Financial Review Committee** reviews all CDBG economic development applications and makes final funding decisions.

## **Gaps in Institutional Structure Assessment:**

Affordable housing has become a familiar issue to much of Colorado. Local governments, private industry, nonprofit organizations and state government have worked hard to tackle the issues involved in providing affordable housing. A Smart Growth initiative created by the Governor's Office includes affordable housing as a concern. Representatives of all sectors have participated in these efforts. The gaps remaining in the institutional structure in Colorado are educating the public and reducing the Not In My Backyard (NIMBY) phenomenon; developing better coordination and cooperation between special needs providers and the organizations that produce housing units; and continuing to educate local agencies to increase the production of affordable housing units statewide.

**Local non-profit organizations and housing authorities:** Many of these groups not only lack funds to meet the demands, they also lack the staff expertise to expand or diversify existing services. While many small agencies are able to develop housing units, there is not enough capacity within the nonprofit community to develop the number of very low, low, and moderate-income units needed in many areas of the state. For the very lowest income households, those with special needs or a need for service-enriched housing, there must be increased capacity to produce more housing.

**NIMBY:** The problem of finding suitable sites for affordable housing continues to be a problem in Colorado. Many neighborhoods are unwilling to have even mixed income rental units nearby, let alone housing for persons with special needs. This lack of understanding about, and fear of affordable housing residents, also hampers efforts to expand Colorado's affordable housing inventory.

### **Strategy to Overcome Gaps**

The Colorado Division of Housing will continue to lead efforts to increase the coordination and involvement of state and federal agencies, public and private nonprofit and others in the leveraging of funding sources, the planning and delivery

of housing related services, and the development of special initiatives to increase and preserve affordable housing for the extremely low, low, and moderate income families and individuals who reside in the State of Colorado. CDH staff will continue to work with local governments and housing providers to increase their capacity to create new affordable housing units. This one-on-one technical assistance will be supplemented by statewide training such as the Developer's Toolkit, *Housing Colorado: a guide for local officials*, Creative Finance, Managing Nonprofits in Tough Times, Basic Underwriting, Advanced Financing, and other workshops which can help increase the capacity of Colorado's housing providers.

The Division of Housing will work with the Department of Human Services and local special-needs providers to encourage partnerships between service providers for special needs populations and housing development agencies. These partnerships are essential to increasing the supply of affordable, accessible housing for special-needs populations. CDH staff will also work to increase the number of very low income units statewide by increasing awareness of the need for 30% rental units, and helping agencies put together the financing structure to make these units feasible.

The "Big Four Group," which includes CDH, CHFA, HUD, and Rural Development meets monthly to discuss multiple agency rules, and annually targets specific priority areas of the state where all funding sources and staff expertise are combined to address immediate housing needs. Staff members of these agencies meet every other month to discuss specific projects and needs.

## **Governmental Coordination**

The Department of Local Affairs is the one agency in Colorado that deals almost exclusively with local governments on all levels of its mission. Cooperation and coordination between the Department of Local Affairs, other involved state agencies, and local governments did not just take place to produce this document. That coordination and cooperation is a daily occurrence, as may be understood by a complete reading of this document.

## **Low-Income Housing Tax Credits (LIHTC)**

The Colorado Housing and Finance Authority (CHFA) has the authority to allocate the LIHTC in Colorado. CHFA and the Division of Housing work closely together in using LIHTC to develop affordable housing. The staff of both agencies is in constant contact to discuss new and existing projects and meet formally every other month to update each other on pending projects. This system will be continued during the next five years. The annual plan for allocation of tax credits in 2007 being finalized by the CHFA Board at this time will be available from CHFA upon request. Below are specific actions that will be taken in the next five years to continue this on-going coordination:

- ❖ Continued close coordination between CHFA and the Division of Housing in the use of LIHTC, federal, state, and private funds for project funding;
- ❖ Education and training for for-profit, nonprofit and local government housing providers in the use of LIHTC and full allocation of all available credits each year for affordable housing

## Monitoring

1. Describe actions to take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

### Monitoring response:

In order to successfully administer state and federal housing funds, Colorado Division of Housing (CDH) has developed a monitoring plan to ensure that the affordable housing units are in compliance with applicable State and Federal guidelines. During the course of grant and or loan administration, Asset Managers (AMs) and other CDH staff monitor project performance in a variety of ways. This monitoring plan will describe CDH monitoring methods that focus on the following programs: HOME, CDBG, ESG, HDG and Section 8 Rental Assistance Programs.

### Project Performance Plan

The Project Performance Plan (PPP) sets forth the goals and milestones that a project must meet in order for it to be successful and in compliance with federal and state requirements. The PPP addresses anticipated project problems and time lines needed to complete and manage the project. The PPP (Exhibit D) applies only to the HOME, and CDBG projects and will be the basis for measuring and tracking the grantees performance through the term of the project. The PPP can include:

- ❖ Financial management systems in place
- ❖ Development of a maintenance plan
- ❖ Development of a marketing plan
- ❖ Leasing and occupancy policies
- ❖ Risk management implementation
- ❖ Construction time lines
- ❖ Housing Agency management capacity and production

The PPP is also used to plan CDH training and technical assistance. A change in the PPP does not warrant a change letter or contract amendment.

The PPP is an assessment of the project needs based on the expertise of the CDH Housing Developer (DEVO), Asset Manager (AM) and the funding recipient (Grantee). A draft PPP is first developed by the DEVO based on their view of the needs of the project. The AM then adds their performance measurement suggestions to the PPP. The AM will contact the DEVO if there are any discrepancies regarding the PPP. The grantee is also made part of the preparation of the PPP and this is usually done in the following manner:

- ❖ A draft copy of the PPP can be faxed to the contractor for input before the contract is mailed to the grantee for signature.
- ❖ The grantee can be contacted by telephone
- ❖ A meeting is held at CDH or grantee's office to review and prepare the PPP
- ❖ The DEVO informs and develops the PPP at initial project meetings that take place to discuss the project.

Project Performance Plans vary, as do the different types of projects that are funded by CDH. To ensure major milestones are covered in the PPP, templates covering the different types of developments and projects have been developed. These templates are not intended to be all-inclusive, as each development team has the ability to tailor the PPP to the individual projects. In addition, the PPP templates contain an additional column that can be used by the Grantee to track quarterly performance. Because the PPP covers all critical milestones a project must meet, AM's are able to easily determine if a project is on-track or if revisions must be made. Some projects will have limited performance measures because the developer is a high functioning and/or another organization is involved in the project. Other organizations that could be involved include CHFA, Mercy Housing, Rural Development, HUD or a private lender. These organizations often provide project oversight in such areas as construction monitoring, maintenance plans and property inspections. When other monitoring systems are in place, CDH does not duplicate these efforts. On the other hand, some projects will have intense and detailed PPP in that a first time developer may be involved and/or there has been staff turnover.

### **ON-GOING PROJECT MONITORING**

CDH requires each project it funds to submit monthly/quarterly reports that provide AMs and CDH staff a project update that flags pending or anticipated problems.

## **Quarterly Financial Report**

The financial quarterly report lists the full financial status of the project including fund balances of the loan or grant provided. The quarterly financial report applies to HOME, HDG, ESG and CDBG projects. The quarterly performance report has been integrated into the PPP. This allows the Grantee to report on PPP milestones within the PPP format. The milestones to be completed in the near future are also listed and any problems or issues that have been encountered. AMs reconcile the performance reports against the PPP for project to track milestones that need completion. AMs contact the grantee or borrower on a monthly basis to track the project performance.

## **Section 8 Monthly Financial Reports**

The Section 8 Contractors submit monthly Housing Assistance Payment (HAP) requests and Lease Status Reports. These reports are used to track the utilization of the program, initiate rental payment changes and certify the rental assistance payments to landlords and participating families. AMs and CDH Section 8 staff provide technical support on an on going basis when needed for program compliance.

## **CONTRACT MONITORING**

Near the end of the contract term or during the course of a fiscal year, AMs monitor each CDH project to ensure that the project is in compliance with the applicable federal and state requirements. Due to some projects needing more attention than others, CDH has developed a Risk-Based Monitoring approach. CDH Risk-Based monitoring allows Asset Managers to focus more time on projects that are at higher risk of encountering problems during the project development.

The level of monitoring for the project will be determined by the Program Manager with input from the CDH Developer and Asset Manager. The Developer and Asset Manager discuss the administrative capacity of each grantee and determine the level of monitoring before recommending it to the Program Manager. The level of monitoring will be listed on the PPP attached to the grantee's contract or on the

semi-annual monitoring schedule established by the AM. The monitoring level may change during the term of the contract, if needed, and if it does not warrant a change letter to be routed for signature. Projects are placed in one of the following three categories:

FULL (F - in monthly Oracle Report) - A FULL monitoring determination requires an Asset Manager to address all identified areas pertaining to the project within the regular CDH monitoring documents. The Asset Manager will also have to visit the project site and complete a housing quality standards inspection on a minimum 5% of the units. The Developer and Asset Manager will recommend a FULL monitoring if the project contains the following:

- ❖ New Grantee - Grantee who has never received funding from CDH and/or Grantee that has not received funding in the last three years.
- ❖ New activity for existing grantee
- ❖ Complicated project
- ❖ Unresolved findings or concerns on last contract
- ❖ Repeat instances of findings or concerns
- ❖ Existing Grantee - new staff in key positions
- ❖ Staff recommendation due to unexpected problems occurring during the project.

PARTIAL (P - in monthly Oracle Report) - A PARTIAL monitoring will require the asset manager to complete a modified monitoring form and perform a site inspection. The grantee may be asked to supply reports such as rent rolls through the mail or fax. The Developer may assist the Asset Manager in performing the site inspection if convenient. The Developer and Asset Manager will recommend a PARTIAL monitoring if the project has the following characteristics:

- ❖ Uncomplicated project
- ❖ Repeat grantee-same/similar type project
- ❖ Grantee had no findings during last monitoring
- ❖ Grantee is considered moderate in administrative capacity

Under the same PARTIAL monitoring category the Asset Manager can classify a project as a Self-Certification monitoring. The grantee completes a modified monitoring form pertaining to the use of the funding award. The self-certification monitoring form is then notarized by the grantee and sent back to the Asset Manager. The Program Manager must approve this type of monitoring in advance.

MINIMUM (N - in monthly Oracle Report) - A MINIMUM monitoring can only apply to a continuing program such as the SFOO Rehab, Down payment, ESG or Section 8 Rental Assistance. This type of monitoring requires only grantee technical assistance if needed, and the contractual monthly/quarterly reporting documents. If a grantee is very high functioning, an on site visit may be delayed for up to two (2) years. The Asset Manager, Developer and Program Manager will only approve this type of monitoring if the project contains the following:

- ❖ Grantee has not received any findings or concerns in the past two (2) years.
- ❖ Grantee is considered a high-functioning project administrator.



## PROJECT CLOSE OUT

HOME, CDBG, ESG and HDG projects are completely closed out upon the final completion of the project. Reporting is required on the following areas:

- ❖ Project Description: Full project description summarizing the specific activities undertaken with State funds.
- ❖ Actual Accomplishments: List all project accomplishments.
- ❖ Remaining Actions: Include any remaining actions and the date of anticipated completion.
- ❖ Audits: Name and address of firm selected to do the audit(s) and the date when the audit(s) will be completed.
- ❖ Total Actual Expenditures for the Activity: All actual expenditures for each activity and expenditures from other funds are listed. Includes the names of the sources and the total amounts of the funds. Refer to the proposed budget in the contract Scope of Services and compare.
- ❖ Project Beneficiaries and Outcome Based Funding requirements: Beneficiaries of the project for all activities are listed as required by HUD.
- ❖ Program Income: Program income generated will be reported now and in the future.
- ❖ Actions to affirmatively further fair housing: Fair housing efforts and complaints will be reported.
- ❖ Section 3 and Davis Bacon: All section 3 requirements and Davis Bacon activities will be reported.

## HOME LONG TERM MONITORING

HOME funded rental projects are required to comply with HOME regulations throughout the term of affordability. CDH conducts an on-site monitoring of these projects based on the number of HOME units funded:

- ❖ At least every three years for projects containing one to four units;
- ❖ At least every two years for projects containing five to twenty-five units;
- ❖ At least once a year for projects containing more than 26 units.

CDH requires yearly rent rolls and eligibility certification by mail in the years between on-site monitoring.

## CDH Monitoring of Consolidated Plan Goals and Objectives

CDH monitors its progress in achieving goals and objectives of the Consolidated Plan through its Oracle data base which captures housing units, projects and leverage; the Integrated Disbursement Information System (IDIS); through periodic reports on housing to the State Legislature; and in completing the Performance Evaluation Reporting System report for HUD. Compliance with program requirements including timeliness of expenditures are assessed programmatically on an ongoing basis and through accounting and internal audit functions of DOLA.



## **Lead-based Paint**

**1. Describe the actions to evaluate and reduce the number of housing units with lead-based paint hazards and increase the lead-safe housing available to extremely low-income, low-income, and moderate-income families.**

### **Lead-Based Paint Hazard Reduction**

The Colorado Division of Housing (CDH) recognizes the serious health risks for children from lead poisoning due to contact with untreated lead-based paint and dust in the state's housing stock. To assist in protecting children from these health risks, the CDH works closely with subgrantees, contract agencies, and the Colorado Department of Public Health and Environment (CDPHE) to assure that the current requirements of Title X of the Community Development Act of 1992 are met in the state's housing programs and projects.

As of September 10, 2001, all provisions of Title X became enforceable in Colorado. These provisions include the regulations found in HUD's Lead Safe Housing Rule (24 CFR part 35). The staff of CDH reviews each proposed housing development program or project to ensure on-going compliance with all applicable sections of Title X. This review is based on the type of project, the type, amount, and duration of financial assistance, and the age of the property. In addition, the CDH ensures that all applicable training and technical resources are made available to local housing providers and developers.

The (CDPHE) has statutory responsibility for the on-going implementation of the statewide comprehensive plan to reduce childhood lead poisoning. In addition the CDPHE is also authorized by the Environmental Protection Agency to provide training, certification, and enforcement programs surrounding lead poisoning and lead-based paint in the state and is also responsible for compiling information on the number and location of children found to have elevated lead blood levels (greater than 10 micrograms/deciliter). During the period 1996 – 2002, approximately 2.5% of all children between the ages of 6 months and 6 years of age tested statewide had elevated blood lead levels. In one Denver neighborhood, over 16% of the children tested had elevated blood lead levels. Efforts of CDPHE and Medicaid educate parents on the sources and hazards of lead poisoning to increase the number of children tested every year statewide. These on-going efforts have led to increased testing of over 40% more children in 2002 (last year data is available) than in the previous year for possible lead poisoning.

There is a single Lead Hazard Control Grantee in Colorado--the Northeast Denver Housing Center (NDHC). Through its Lead Hazard Control Grant, NDHC responds to reported incidences of elevated blood level in lower income children in lower income households across the state. In addition, NDHC provides comprehensive lead hazard identification and reduction activities in specific neighborhoods in the City of Denver. Information obtained from the 2000 Census and the Center for Disease Control (CDC) report, "Surveillance for Elevated Blood Lead Levels Among Children – US, 1997-2001" (September 2003), indicates that there are over 21,000 housing units with a lead hazard risk. This risk is defined as housing units built before 1950 that are occupied by households living below the poverty level.

The Colorado Division of Housing will implement the following activities during the period of 2005 – 2010 to ensure statewide compliance with applicable lead-based paint regulations.

### **Activity 1: Enhance Existing Partnerships**

The Colorado Division of Housing will continue to assist with public and private efforts to reduce lead-based paint hazards across the state. This includes on-going involvement in the inter-agency work group, the Colorado Lead Coalition that serves to develop and implement strategies for statewide lead hazard reduction and education efforts. Besides the Colorado Division of Housing, this coalition includes the U.S. Environmental Protection Agency, Denver Health, the U.S. Department of Housing and Urban Development, Colorado Department of Health and Environment and other agencies. In addition, CDH works with the Northeast Denver Housing Center to ensure that Lead Hazard Control Grant funds are available to assist households with identified elevated blood level children across the state.

### **Activity 2: Provide Lead Hazard Information to Housing Providers, Local Officials and Assisted Households**

All Colorado Division of Housing sub-grantees, contractors and local housing and service providers are provided with the most current required publications for distribution to occupants of housing units assisted with CDH funds. For example, the EPA Pamphlet, "Protect Your Family From Lead in Your Home" is distributed to local housing and service providers that, in turn, distribute this publication to all applicable households. CDH funded programs that receive lead hazard information include the Single-Family, Owner-Occupied Rehabilitation Program, the Section 8 Voucher Program, down payment assistance programs, and programs that assist in the acquisition and rehabilitation of rental properties.

### **Activity 3: Enhance Existing Delivery System and Technical Capacity**

The Colorado Division of Housing will continue to provide technical assistance to sub-grantees, contractors and local housing and service providers on requirements of Title X through web-based training, on-site visits, project underwriting, and the distribution of best practice methods. The goal of enhancing the existing delivery system and technical capacity concerning lead-based paint hazard identification and reduction is to comply with the regulations in the most effective and economical way possible.

#### ***New Activities:***

- Increase involvement in CDPHE LBP education activities,
- Sponsor additional Lead-safe Work Practice trainings around the state.

### **Estimate of units with Lead-based Paint**

As noted in the chart below, the estimate is that 661,282 housing units (+/-10%) in Colorado contain lead-based paint. The estimated total number of low-income units that may contain lead based paint is 431,736 (+/-10%) or approximately 65% of all housing units that contain lead-based paint.

Estimate of Housing Units with Lead-Based Paint – State of Colorado								
Built Date Range	Total Units Built	Renter Units			Owner Units			Total Low Income Units
		Total rental units	Extremely Low	Low	Total owner units	Extremely Low	Low	
Pre-1940	145,236	56,435	34,453	18,934	88,801	18,214	32,771	104,372
1940-1959	54,530	22,286	12,970	8,329	32,244	5,775	14,349	41,423
1960-1979	61,516	168,400	88,644	67,551	293,116	39,258	90,488	285,941
<b>Total</b>	<b>661,282</b>	<b>247,121</b>	<b>136,067</b>	<b>94,814</b>	<b>414,161</b>	<b>63,247</b>	<b>137,608</b>	<b>431,736</b>

## HOUSING Specific Housing Objectives

### 1. Describe priorities and specific objectives for the next year.

The housing priorities and specific objectives the State hopes to achieve during 2007 are based on commitment and expenditure of prior and/or current HOME, CDBG, ESG and HOPWA funding, since the majority of activities and projects are multi-year funded.

Project Type	Objective/Outcome Statement
HOME– construction, rehab or acquisition of rental housing for very low-income, homeless or special needs persons	Objective: Decent Housing Outcome: Affordability
HOME – Repair/rehab very low-income, owner-occupied, single family housing	Objective: Decent Housing Outcome: Affordability
HOME - TBRA – provide rental assistance to very low-income households, with a priority for homeless persons and families	Objective: Decent Housing Outcome: Affordability
HOME--ADDI – Provide down payment assistance for first-time homebuyers	Objective: Decent Housing Outcome: Affordability
ESG – provide operating support and essential services for emergency shelters	Objective: Decent Housing Outcome: Suitable Living Environment
HOPWA – provide rental assistance, support services and other HOPWA-eligible assistance to persons with AIDS	Objective: Decent Housing Outcome: Availability/Accessibility
CDBG – housing rehabilitation	Objective: Decent Housing Outcome: Affordability
CDBG – activities in support of new housing construction	Objective: Decent Housing Outcome: Affordability
CDBG – standardize needs assessment data across the state	Objective: Decent Housing Outcome: Availability/Accessibility

**2. Describe how available Federal, State, and local public and private sector resources will be used to address identified needs during this Action Plan year.**

Please refer to the table on page 6 for a list of federal, state and local resources that may be available to community development, housing and economic development projects. Agencies appearing on this list are **potential** partners, and may complement funding available through the HOME, ESG, CDBG and HOPWA programs for public facilities, economic development, construction of new housing units, preservation of existing affordable housing stock, reduction of homelessness and provision of housing/services to persons with HIV/AIDS. DOLA maximizes its funding resources by encouraging, or, in some cases, requiring local participation in community, economic and housing development activities.

### **Needs of Public Housing**

**1. Describe how the jurisdiction's plan will help address needs of public housing and how it will encourage residents to become more involved in management.**

The State does not operate public housing and therefore does not plan resident initiatives.

**2. The jurisdiction shall describe the manner in which it will provide financial or other assistance to improving the operations of "troubled" public housing agencies during the next year.**

There are no troubled housing authorities in Colorado at this time. If the HUD Troubled Agency Recovery Center determines that there are troubled housing authorities in need of assistance, it will contact the Division of Housing (CDH) and CDH services will be offered as a resource to these housing authorities at that time.

**3. Other Housing Issues: What is the availability of abandoned buildings suitable for conversion to housing?**

While many communities have inventoried abandoned buildings to determine potential reuse and conversion, there is no central data base for all such buildings across Colorado. Market economics is a major consideration in recycling sites. There is often a gap between the economic feasibility of completing a redevelopment project and the value of the repaired parcel. A sufficient rate of return is necessary to make a property transaction viable. Changes in market conditions can provide the impetus to redevelop. For example, an historic building in the Town of Georgetown resulted in a renovation that yielded affordable housing for the community. For properties with obvious potential, redevelopment will likely proceed with little prompting. However, renovation costs, environmental costs, and high-risk reserves held by investors all serve to widen the feasibility gap.

### **Barriers to Affordable Housing**

The State's rapid increase in development from the early 1990's to early 2000's made growth management issues a primary concern for state and local elected officials in Colorado. Many communities undertook a close examination of public policies that guide the creation of transportation systems, water supply, open space, and housing. Many also adopted policies that growth should "pay its own way," resulting in sometimes complex impact fee structures. Although Colorado's economy

has slowed in recent years, these growth-control policies and fees remain in place and continue to affect affordable housing.

Depending on the public policy objective, growth control policies can be used as either management tools – controlling and directing appropriate development – or as regulatory barriers – to prevent additional development. This is most apparent in housing development, which is affected by every tool a community might use to control growth. They include annexation and zoning policies, both in terms of the amount of land available for residential development and its density; subdivision design and engineering standards; impact fees for infrastructure and other public facilities such as schools, libraries, open space, parks, fire and police stations; building codes; limitations on the number of building permits allowed each year; and regulations to protect environmental and cultural resources.

The Division defines regulatory barriers as either deliberate or de facto actions that prohibit or discourage construction of affordable housing without reasons directly related to public health and safety; a federal, state, or local statute, ordinance, policy, custom, practice, or procedure that excessively increases the cost of new or rehabilitated housing, either by improperly restricting the location of housing, or by imposing unjustified restrictions on housing development with little or no demonstrated compensating assistance.

### **Local Regulatory Barriers**

We first examined the type and prevalence of local regulatory barriers. CDH identified five categories of land use regulations frequently cited as barriers to affordable housing. These include: (1) infrastructure financing, (2) zoning and subdivision controls, (3) building codes, (4) permitting and procedural rules, and (5) environmental regulations. The Division of Housing works with communities to show how local governments in Colorado could modify regulations to reduce their impact on affordable housing. This assistance is provided through technical workshops on land use planning and on financing affordable housing. CDH also works with each developer to negotiate a reduction in local regulatory cost during our application review process.

**Financing Public Improvements:** Direct payments for expanding roads, parks, and utilities are referred to as an impact fee. Land dedications are often required for larger developments to reduce the expansion cost of schools or parks. Local governments may also require an exaction, which conditions approval of new development for on-site or off-site improvements, such as right-of-ways for expanded transportation or utilities.

**Zoning & Subdivision Controls:** Zoning regulations affect density, housing size, accessory dwelling units, etc. The primary purpose of zoning restrictions is to separate incompatible land uses. These regulations also are used to maintain real estate values by enforcing controls on the location, size, and appearance of all residential and commercial buildings. However, zoning regulations can limit the use of the most affordable types of housing – multifamily and manufactured housing – by limiting the amount of land zoned for this purpose. Subdivision regulations affect site plan design and engineering standards for streets and utilities.

**Building Codes:** A third type of regulation likely to affect a community's affordable housing is the local building code. A building code serves the important public purpose of health and safety by governing the use and installation of materials and

design and construction standards for the building. A local building code plays a vital role in protecting not only the occupants of the building but also its long-term value.

**Permitting and Procedural Rules:** Application fees & review schedules are part of every local approval, including annexation, zoning, site plan, subdivision, and building permits. Sometimes these have open-ended approval timelines, and fees can be charged at any point in the process. Time delays in the approval process add uncertainty and risk to an already expensive investment. The following is a table showing how some local governments have modified their process.

**Environmental and Cultural Protection:** The Clean Water Act, the Endangered Species Act, the National Environmental Policy Act, and the National Historic Preservation Act are prevalent federal environmental statutes encountered when developing or redeveloping affordable housing. Each of these mandates is federal and must be adhered to by local governments in their development procedures and policies. It is the unpredictability of these regulations that give pause to private investors. Many of the regulatory remedies seek to identify environmentally sensitive land parcels or buildings so private investors can avoid the additional cost or delays inherent in mitigating impacts on the environment.

#### **Local Land Use Policies**

CDH will utilize an outside firm to examine land use barriers. This report will analyze a variety of policy and intergovernmental land use issues.

#### **Effectiveness In Reducing Impact Of Land Use Regulation**

The Division of Housing (CDH) provides technical assistance to local governments seeking to modify land use regulations in order to encourage affordable housing development. A priority for CDH during our application review process is to assess a local government's financial contribution compared to the impact its regulations and policies have on the total project cost.

#### **Technical Assistance**

The Division will provide workshops for local government officials about regulatory barriers. The workshops will work towards increasing governmental participation in affordable housing partnerships and providing land use tools that reduce the impact of regulation on affordable housing. Presentation will be made at housing summits, focus groups, round tables and other training venues. It is also anticipated that regulatory barriers will be an issue discussed with local governments in the course of project funding.

Based on the success of these workshops and publications such as "Reducing Housing Cost through Regulatory Reform," CDH has become a primary resource to local governments seeking to modify land use policy to encourage affordable housing development. Examples of communities modifying land use policies and regulations to increase their affordable housing supply include the City of Brighton and Garfield County. The Town of Berthoud, in the Northern Front Range, is in the process of developing a comprehensive plan and will utilize strategies from our training and publications in their efforts.



# HOME/ American Dream Down payment Initiative (ADDI)

## SPECIFIC PROGRAM DESCRIPTIONS

### I. FUND DISTRIBUTION

It is estimated that at least \$8,884,025 will be allocated to the State of Colorado for federal fiscal year 2007. Administration is expected to be 10%, \$888,402. Should the Division of Housing receive either more or less funding than this figure, funds will be distributed through the same methodology as follows. The Division will utilize a competitive application process except for existing multi-jurisdictional single-family owner occupied rehabilitation programs that will receive funding in accordance with the State Single Family Owner Occupied Rehabilitation Policy. Applications will be reviewed and considered on a continuous basis by the Department of Local Affairs, Division of Housing. The Division may end or defer consideration of housing proposals when funds available have been exhausted or when proposals are incomplete or premature.

Applications for HOME should reflect local needs and be consistent with the State's Consolidated Plan. The Division has developed tools that analyze applications and guide potential applicants: the **Cost and Effectiveness Rating Instrument (CERI)** and the **Funding Gap Analysis Spreadsheet**. CDH staff review applications to ensure proposals meet the federal requirements for each program, including the HOME program.

CERI and the Funding Gap Analysis Spreadsheet are used by the CDH staff and the State Housing Board to evaluate the relative merits of funding applications. Two separate assessments determine the Division's Cost Effectiveness Rating. The sum of these two assessments, the cost of housing a person and the type of housing being developed, measure the cost and effectiveness of each development. The Division's development staff will use the following procedures on rental and homeowner projects with single sites.

### Colorado Division of Housing's Cost Effectiveness Rating

Each scale below is completed to determine the cost effectiveness rating for a project.

#### Step One: Cost Per Person Housed

By completing the development cost page of the Housing Development Analysis Spreadsheet, CDH uses the total development expense to calculate the cost per person housed. The total development expense is divided by the estimated number of people housed in the proposed development. The total number of people housed in the development is determined by multiplying the total number of bedrooms by 1.5 people for family and one for efficiencies and Single Room Occupancy (SRO). This number per bedroom is based on the California Affordable Housing Cost Task Force Policy Report, 1993. The cost per person is the result of this calculation. The following is an example:

The total number of bedrooms for this example is 180. Since this is a family rental, the number of bedrooms (180) is multiplied by 1.5 persons per bedroom. If this

example included efficiencies, SROs, or only seniors, the person per bedroom could be adjusted to one person per bedroom.

$$180 \text{ bedrooms} \times 1.5 \text{ persons per bedroom} = 270 \text{ persons}$$

The total development expense for this project is \$4,870,000. This number is divided by the number of persons housed by the development.

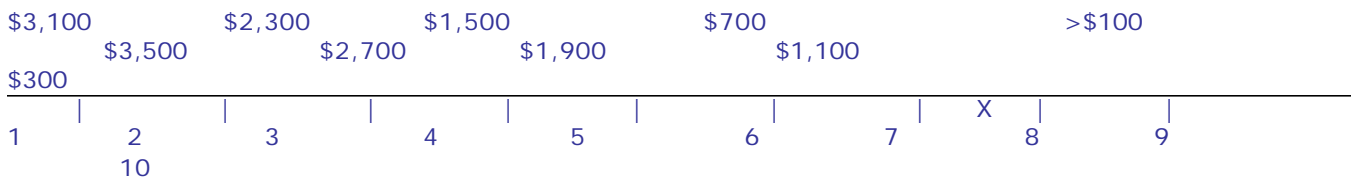
$$\$4,870,000 / 270 = \$18,037$$

The answer, \$18,037 is the amount of development expense required to house one person. To accurately measure the total impact, the per-person cost is divided by the affordability period. In this example, the affordability period is 30 years.

$$\$18,037 / 30 = \$601 \text{ per year}$$

How does this cost compare to other developments financed by the Division? It is estimated that the average per unit cost of a two-bedroom apartment financed by the Division is \$70,000. To draw this comparison, a scale is used which gives a range of the construction cost per person housed. This range is \$35,000 to \$11,667. These costs are divided by the minimum 10 years and the maximum 50 years for affordability to determine the following scale.

#### Cost Per Person Housed



A numerical value of 8 would be given to this result. This value is marked by the X.

### Step Two: Externalities

An assessment is made of a proposed housing development's effectiveness as a place to live. Ten factors are used to measure a housing development's social, environmental, and personal impact on individual residents or the community in general. The Division of Housing uses a list of ten externalities to make this determination.



### The Externalities Matrix

<b>Externalities Matrix - Each external factor below should be scored positively or negatively based on the measure indicated.</b>	<b>+1</b>	<b>-1</b>
1. Project Impact/Need - The project meets an affordable housing need evidenced by market data.		
2. Public/Private Commitment - The project has local government or community financial support.		
3. Management Capability - The project developer has the capability of completing the project in a timely and satisfactory manner.		
4. Consistency With Local Land Use Plans - Utilities, infrastructure, transportation and public services are available to the project without undue hardship or excessive cost.		
5. Environmental Impact - The project will not have a detrimental impact on air quality, water quality, noise levels, view corridors or other locally determined areas of environmental concern.		
6. Social Impact - The project will not have a detrimental social impact on the community or the residents.		
7. Special Needs Population - Households residing in the project include persons with physical or mental disabilities or independent or assisted housing for seniors.		
8. High Growth Area - Counties with a greater than average growth in population or housing cost over the last two years.		
9. Preservation of Existing Affordable Housing - The project would acquire and/or rehabilitate existing affordable rental housing.		
10. Serving Persons With Extremely Low Incomes - The project would provide at least 5% of their rental units to persons with incomes below 30% AMI.		

Each factor receives either a +1 or a -1 in scoring each externality. The total score is then compared to the following range:

-10 -9 -8 -7 -6 -5 -4 -3 -2 -1 0 1 2 3 4 5 6 7 8 9 10  
x

### Step Three: Rent Savings

The CDH Rent Savings Rating, return on investment, compares the amount of CDH investment in a project to household rent savings. The rent savings is the amount of household income saved by a family or individual who is paying a subsidized rent compared to a market rent. The difference between subsidized rents and market rents can vary widely in Colorado. Development staff will use the following procedures for rating the rent savings of each new construction/rehabilitation project.

1. CDH development staff will complete the attached Rent Savings matrix for each proposed rental project. The "Market Rents" section will list the market rents for the entire project by bedroom size. The sources for market rents

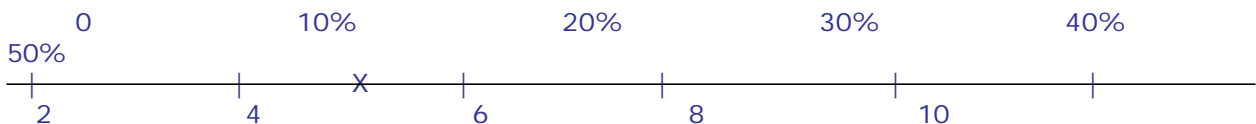
include: The CDH Multifamily Vacancy & Rental Survey, the Denver Metro Apartment Vacancy & Rent Survey, current market area appraisals, and in the absence of any market data, other comparable rent sources. The "Proposed Rents" section will list the market and affordable rents developers are proposing to charge households. The difference between the total of Market and Proposed Rents will be listed as Annual Rent Savings for each household.

The CDH development staff will enter the requested CDH subsidy amount. This will be used to calculate the per unit subsidy amount for rent restricted units and the return on investment shown as a percentage of the savings per unit and the CDH subsidy per unit. The following examples show that the CDH return on investment is 20%.

### Rent Savings Worksheet

Market Rents				Proposed Rents			
	Rents	#-units	Total Rent		Rents	# units	Total Rent
OBR		0	0	OBR	0	0	0
1BR	543	14	7602				0
2BR			0				0
3BR			0	1BR	250	6	1500
4BR	0	0	0		350	6	2100
	Total MKT rent		\$7,602		400	2	800
				2BR	0	0	0
					0	0	0
					0	0	0
Monthly Rent Savings:	\$3,202			3BR	0	0	0
Annual Rent Savings:	\$38,424				0	0	0
Total Units		14					0
Annual Savings/unit:	\$2,745			4BR			0
DOH Subsidy:	195000						0
DOH Subsidy/unit	13928.5714						0
				Total Proposed rent			\$4,400
*Sav per unit/DOH sub per unit:			20%				

\*The Return On Investment (savings per unit/CDH subsidy per unit) in this example is calculated by dividing the Annual Rent savings per unit, \$2,745, by the CDH Subsidy per unit, \$13,928. Return On Investment from Rent Savings



### Step Four: Leveraging

The Division uses its funding to fill a financing gap for affordable housing developments. By filling this gap with either a loan or grant, the Division forms partnerships with other financing sources to complete the financial feasibility of a development. By sharing the risk with other funding partners, the Division leverages its resources with private and public investors. The leveraging ratio is created to show the amount of funds from other sources the Division is able to match or secure by its investment. This "leveraging ratio" is measured on a ten-point scale. One point is given for each dollar leveraged, up to a maximum of 10 to 1. For

developments able to leverage more than \$10 for every \$1 CDH, the scale is limited to a maximum score of 10. In the example, the Division invests \$200,000 and leverages an additional \$4.6 million. This scores 10 on our leveraging scale.

Amount Leverage



Rating



## Step Five

Cost Effectiveness Composite Score (This score is the total of all four of the above factors).

### The Colorado Divisions of Housing's Gaps Analysis Spreadsheet

The second tool used by CDH staff is a **gaps analysis spreadsheet**, used to analyze project development cost, income and expense. This analysis results in a determination of how much debt a project can reasonably service, and the amount of gap funding required for the project to proceed. Gap funding is filled through a variety of sources, including CDH-administered funds.

The combination of these two tools allows the State Housing Board (SHB) to target limited resources to the housing activities with the highest need in an individual community. The amount of subsidy required can also be determined. Development staff can provide community-housing developers with specific guidance regarding project development. This allows development staff to work in the planning stages, guiding and modifying projects before they go before the SHB.

Early in the process, CDH staff provides feedback to developers regarding the appropriateness of development concepts. This timely intervention is necessary because developers must incur predevelopment expenses (sometimes in excess of \$100,000) before a project can be brought before the SHB. Developers are discouraged from submitting requests that do not meet CDH priorities. While staff works with developers to modify projects to meet CDH standards, only projects that meet the priority target populations are cultivated.

The results of the staff review are forwarded to the Executive Director of the Department of Local Affairs, and brought to the Colorado State Housing Board, an advisory board. The consultation with the board is usually at a regularly scheduled monthly hearing, but also may be by telephone or mail. The Department Executive Director considers staff reviews and any advisory committee recommendations and makes the final funding decisions based on the project review factors.

In making funding decisions as well as proposed modifications to funded projects, the Department Executive Director may specify alternatives or changes as he deems necessary or appropriate, consistent with the project review factors. Alternatives and changes specified may include, but are not necessarily limited to: providing more or less funding than requested, proposed, or recommended; adjusting project budget line items; providing funds for only selected activities within an overall project;

making a single award to two or more separate applicants so that projects can be undertaken on a multi-jurisdictional basis; changing terms, uses, and conditions; and permitting projects to be amended to include additional, fewer, or different project activities.

**DIRECT ADMINISTRATION:** The Department of Local Affairs may choose to administer HOME funds directly if it determines that a specific project would benefit from such administration.

**GEOGRAPHIC FUND DISTRIBUTION:** The Department of Local Affairs intends to distribute HOME funds by considering both geographic and population needs. Funding decisions will include consideration of prior housing projects funded within the area as well as quantified need level driven by population distribution including the needs of special populations as identified in the State of Colorado's annually approved Consolidated Plan. Projects that occur in high growth areas are considered to be high priority projects.

## **II. COMMUNITY HOUSING DEVELOPMENT ORGANIZATIONS**

The State of Colorado will reserve fifteen percent of its allocation for community housing development organizations (CHDOs). The amount available for CHDOs is expected to be up to \$1,332,603. The CHDO funds will also be distributed through a competitive process on a continuous basis.

The CDH will identify CHDOs in the state through a two-fold process: a questionnaire will enable potential and existing CHDOs to determine if they are eligible as CHDOs. It will be sent upon request to nonprofits and housing providers throughout the state. At the same time, CDH housing development staff will continue to work to identify potential CHDOs in their specific geographic areas. Applicants and/or their sub-grantees applying through the competitive process for HOME funds will also be screened to identify any existing or potential CHDOs.

It is anticipated that the types of activities to be undertaken by CHDOs will be acquisition, rehabilitation, homebuyer programs, and new construction. It is also anticipated that some CHDOs may be interested in applying for the project specific technical assistance loans.

## **III. OTHER FORMS OF INVESTMENT**

The Division of Housing does not provide any forms of investment to projects other than those described in 92.205(b) of the HOME regulations.

## **IV. REFINANCING**

HOME funds may be used to refinance existing debt on an eligible single-family, owner-occupied property when HOME funds are used to rehabilitate the unit, if the overall housing costs for the owner will be reduced and the housing made more affordable.

HOME funds may also be used to refinance existing debt on multifamily rehabilitation, or new construction projects if refinancing is necessary to permit continued long-term affordability and is consistent with the state established guidelines. To qualify, the proposed project must meet one of the following criteria:

- ❖ Rehabilitation is the primary eligible activity. This means that the amount of HOME funds being used for rehabilitation must be equal to or in excess of the

amount of HOME funds being used to refinance existing debt on the property. At a minimum, the ratio of rehabilitation costs to refinancing costs must be 1 to 1, or a minimum rehabilitation cost of \$5,000 per unit;

- ❖ A review of management practices should demonstrate that disinvestment in the property has not occurred, that the long-term needs of the project can be met, and that it is feasible to serve the targeted population over the proposed affordability period;
- ❖ The application must state whether the new investment is being made to maintain current affordable units, create additional affordable units, or both;
- ❖ The required period of affordability will be a minimum of 30 years;
- ❖ The state will accept applications for refinancing statewide; and,
- ❖ HOME funds will not be used to refinance multifamily loans made or insured by any Federal program, including CDBG unless additional affordable units will be income-restricted to low income household or the affordability period is being extended.

#### **V. COSTS RELATED TO PAYMENT OF LOANS**

If the HOME funds are not used to directly pay a cost specified in this section, but are used to pay off a construction loan, bridge financing loan, guaranteed or insured loan, the payment of principal and interest for such loan is an eligible cost only if:

- (1) The loan was used for eligible costs specified in this section, and
- (2) The HOME assistance is part of the original financing for the project and the project meets the requirements of this part.

#### **VI. ADMINISTRATION AND PLANNING COSTS**

The Department of Local Affairs, Division of Housing may expend for its HOME administrative and planning costs ten percent (10%) of the HOME allocation.

#### **VII. HOMEBUYERS PROGRAM**

The Department of Local Affairs, Division of Housing, will accept applications for homebuyer programs if they meet the guidelines for resale or recapture as required in 24 CFR 92.254. Homebuyer program guidelines must meet the following federally required qualifications.

##### **Qualify as affordable:**

- ❖ If purchased with or without rehabilitation, the initial purchase price does not exceed 95% of the median purchase price for the type of single-family housing (1 to 4-family residence, condominium unit, cooperative unit, combination manufactured home and lot, or manufactured home lot) for the area as determined by HUD; and has an estimated appraisal value at acquisition, if standard, or after any repair needed to meet property standards in ? 92.251, that does not exceed 95% of the median purchase price for similar type of single-family housing.
- ❖ It must be the principal residence of the owner whose family income qualifies (equal to or less than 80% of area median family income) at the time of purchase;
- ❖ Is purchased within 36 months if a lease-purchase agreement in conjunction with a homebuyer program is used to acquire the housing;

- ❖ Meets the federally required resale restrictions or the federally required minimum affordability periods. However, the state will seek to maximize the affordability period for homeowner and rental properties. To maximize affordability, we have established a threshold of thirty (30) years, but will make every effort to extend this period to 40 years and beyond.

### **STATE GUIDELINES FOR HOMEBUYER PROGRAMS**

The State will assure that any homebuyer program capitalized with HOME funds will meet the following requirements for the properties and prospective homeowners to participate in this activity.

**ELIGIBLE ACTIVITIES:** HOME funds may be used for acquisition or for the acquisition and rehab of homes for homebuyers whose incomes are equal to or less than 80% of area median income.

**ELIGIBLE PROPERTY-OWNER:** The prospective purchasing household must meet two key federally required eligibility criteria in order to participate.

- 1) Must have a gross income that does not exceed eighty percent (80%) of the area median income. The purchasing household must be low income at the time of the household initially occupies the property, or at the time the HOME funds are invested, whichever is later. Verification of income eligibility is good for a period of six months.
- 2) Must occupy the property as a principal residence. The deed and the loan documents (Promissory Note) between the buyer and seller should incorporate this requirement and the requirement that subleases are only allowed with written approval by the State.

A third criterion has been added by the state. This criterion limits homebuyer assistance to households with incomes between 60% and 80%. This criterion reflects the minimum income required by homeownership to initially purchase and maintain a home. Homeowners participating in a self-help housing program may have incomes less than 60% AMI.

**ELIGIBLE PROPERTY TYPES.** Property that is eligible to be used in a homebuyer program is not restricted to federal properties or to other publicly held properties. The property can be PRIVATELY or PUBLICLY held prior to sale to the homebuyer. The property can be an existing property or newly constructed. Any property which will serve as the purchaser's principal residence, including:

- ❖ A single family property (one unit);
- ❖ A two to four unit property;
- ❖ A condominium unit;
- ❖ A manufactured home and lot;
- ❖ A manufactured home lot; and,
- ❖ A cooperative unit.

**FORMS OF OWNERSHIP.** For purposes of the HOME program, homeownership means ownership in fee simple title, or a 99 year leasehold interest in a one to four unit dwelling or in a condominium unit, or ownership or membership in a cooperative

or mutual housing project if recognized by state law as homeownership. The ownership interest may be subject only to the following:

- ❖ Mortgages, deeds of trust or other debt instruments approved by the State; and,
- ❖ Any other encumbrances or restrictions that do not impair the marketability of the ownership interest, other than the HOME program restrictions on resale.

**PROPERTY STANDARDS.** Before property transfer, the house must be inspected for health and safety defects. The prospective purchaser must be notified of the work needed to cure defects and the time frame which it will take to complete the repairs.

**Acquisition Only** -- Property must meet local housing standards or codes at the time of initial occupancy. If no standards exist, Section 8 Housing Quality Standards (HQS) must be met.

**Acquisition and Rehabilitation** -- where rehabilitation to the property is needed. The property must be free from any defects that pose a danger to the health or safety of occupants before occupancy and not later than 6 months after property transfer. Within 2 years of property transfer to the homebuyer, the property must meet all applicable local codes, rehabilitation standards, ordinances and zoning ordinances at the time of project completion.

All construction projects (rehabilitation and new construction) assisted with HOME funds must meet local codes, rehabilitation standards, ordinances and zoning ordinances. In the absence of local requirements, projects must meet the following:

- ❖ One of three model codes--Uniform Building Code (ICBO); National Building Code (BOCA); Standard Building Code (SBCC)
- ❖ Council of American Building Officials One to Two Family Code (CABO);
- ❖ Minimum Property Standards (MPS) in 24 CFR 200.925 or 200.926.

**New construction** -- Newly constructed housing must meet the Model Energy Code published by the Council of American Building Officials.

HOME-assisted construction must meet the accessibility standards of the Fair Housing and Section 504.

**PROPERTY VALUE (AT TIME OF PURCHASE).** The initial purchase price that does not exceed 95% of the median purchase price for the type of single-family housing for that type of housing. The state may establish the area median value by using the Section 203(b) limits or the state may establish the value through a community-wide market analysis. The value may be established by an appraisal by a qualified appraiser or qualified staff of a HOME program administrator.

**INCOME QUALIFICATION AND AFFORDABILITY.** There are NO federal requirements that the homebuyer remain low income after purchase of the unit. There is NO federal requirement that determines a minimum or maximum amount for the monthly housing costs (PITI) or, that the homeowner's PITI remain affordable to the homebuyer. However, the state does use a maximum household income of 80% and a minimum household income of 60% for initial eligibility, unless the purchaser is a self-help program participant below 60% AMI.



**RESALE RESTRICTIONS OR RECAPTURE PROVISIONS.** In accordance with the HOME Program requirements the State will accept either the resale restriction or the recapture provision for maintaining the affordability of housing in Homebuyer Program Policies submitted in applications requesting HOME funding. The restrictions and recapture provisions are the following: NE – Create Another Affordable Unit by recapturing the HOME Investment

#### **OPTION ONE – Create Another Affordable Unit by recapturing the HOME Investment**

The property may be sold during the affordability period with full or partial repayment of the HOME assistance. Recaptured funds must be used for more HOME eligible activity.

- ❖ Recapture entire amount - require the entire investment to be repaid.
- ❖ Reduction during affordability period - the investment amount to be recaptured may be reduced on a pro rata basis for the time the homeowner has owned and occupied the housing measured against the affordability period.
- ❖ Shared net proceeds - If the entire amount cannot be recaptured plus enable the owner to recoup their down-payment and capital investments in the property, the proceeds may be shared based on the following formula.

*HOME investment:*

HOME investment + Homeowner investment / Net Proceeds = % of HOME \$ to be recaptured

*Homeowner investment:*

HOME investment + Homeowner investment / Net Proceeds = % of Amount to homeowner

HOME funds subject to recapture include any development subsidy or direct assistance to the homebuyer that reduced the purchase price from fair market value to an affordable price, or any down payment or subordinate financing provided on behalf of the purchase.

#### **OPTION TWO – Sell the Existing Property to a Subsequent Low-income Purchaser**

The subsequent purchaser must be a low-income family (80% or less of area median income) that will use the property as its principal residence.

- ❖ The sale of the property to the new low-income family must be at a price which allows \_\_\_\_\_ for: "fair return on investment, including any improvements" to the seller (the former homebuyer).

AND ALSO,

- ❖ The property must be affordable to a reasonable range of low-income purchasers.
- ❖ Housing may be presumed to meet all of the resale requirements (i.e., fair return, affordable, and that the subsequent buyer is low income) during the



period of affordability without enforcement mechanisms if this presumption is supported by a local market analysis.

- ❖ The market analysis of the neighborhood must indicate that the housing is and will continue to be available and affordable to a reasonable range of low-income families.

**AFFORDABILITY PERIOD RESTRICTIONS** on sale of the property are waived if homeowner defaults on the first mortgage and foreclosure proceedings are initiated. However, affordability restrictions are revived if, during the original affordability period, the owner retains ownership of property.

The amount of development subsidy required to produce the unit in excess of the fair market value is not subject to recapture. If the HOME subsidy is only used for the development subsidy in excess of the fair market value, the Option Two, the resale option, must be used.

Whether Option One or Two is used -- after the required affordability period based on the amount of HOME assistance ends -- the property may be sold at any price to any new homebuyer, without any consideration of the purchaser's income.

**FORMS OF SUBSIDY:** HOME funds may be used for down payment and closing cost assistance, interest subsidies, direct loans, or grants for acquisition, rehabilitation of existing units and/or construction of new units. The program may use one or more of the above forms of subsidy.

If the HOME funded subsidy is:

- ❖ down payment and/or closing cost assistance, it must be in the form of a secured debt, such as a deferred loan to help enforce the principal residency and resale provisions;
- ❖ an interest subsidy paid directly to the first mortgage lender in order to reduce the interest rate on the loan, there must be a provision that a proportionate refund will be provided to the State or its state recipient or sub-recipient if the private loan is prepaid before the loan maturity date;

**AMERICAN DREAM DOWNPAYMENT INITIATIVE FUNDS:** The Colorado Division of Housing will include American Dream Down payment Initiative (ADDI) funds of **\$362,047** in our regular application process, with local governments, housing authorities and nonprofit organizations designated as eligible sub grantees. These funds will assist eligible first-time low-income and minority households, and will become an alternative source for down payment, closing costs and/or rehabilitation assistance. The amount of ADDI assistance provided will not exceed \$10,000 or four and a half (4 ½) percent of the FHA mortgage limit of the home, whichever is greater. Rehabilitation will be required to be completed within one year of the home purchase, and may include, but not be limited to, the reduction of lead paint hazards and the remediation of other home health hazards.

**TARGETING PUBLIC HOUSING AUTHORITY RESIDENTS WITH ADDI FUNDS:** CDH will target residents of Public Housing Authorities and manufactured housing by (1) providing information about ADDI during Public Housing Authority Directors Meetings; (2) announcing the availability of ADDI funds at the Colorado Chapter of National Association of Housing and Redevelopment Officials Annual Conference; (3)

adding material about ADDI to our Application Workshops which are conducted across the state several times during the year; (4) providing information on the CDH website; and (5) providing the information to the Manufactured Housing Association of Colorado.

**ELIGIBILITY:** To be eligible for ADDI assistance, individuals will be first-time homebuyers interested in purchasing single-family housing. A first-time homebuyer is defined as an individual and his or her spouse who have not owned a home during the three-year period prior to the purchase of a home with ADDI assistance. ADDI funds may be used to purchase one- to four- family housing, condominium unit, cooperative unit, or manufactured housing. Additionally, households qualifying for ADDI assistance will have incomes not exceeding 80% of AMI.

**UNDERTAKING AND MAINTAINING HOMEOWNERSHIP:** Sub grantees will be required to provide or arrange for homebuyer counseling that will enable clients to understand and maintain homeownership.

### **VIII. TENANT-BASED RENTAL ASSISTANCE PROGRAM (TBRA)**

The Department of Local Affairs, Division of Housing, will accept applications for operating a tenant-based rental assistance program from a public housing authority or any other entity with the capacity to operate a rental assistance program within their community or region. Home-eligible communities can apply for tenant-based rental assistance. CDH will offer tenant-based rental assistance for the next two years to address special needs populations.

- . This TBRA will target those with incomes at or below 30% AMI
- . Each of the participating households will be required to access social services provided by their county of residence.

TBRA is considered to be an essential part of our approved housing strategy for 2007. Each TBRA application will be judged by its impact on addressing a community's affordable housing needs, but specific consideration will be given to weighing the TBRA method of assistance with less costly housing alternatives.

Applications will be evaluated based on the following factors:

1. The immediacy of the need for TBRA:

- ❖ Displacement caused by natural disaster, job loss, domestic violence, or other emergency family situations.
- ❖ Program responds to local market conditions (In 2006-2007, the housing market improved but the cost of available units increased, rendering units unaffordable for very-low income, special needs and homeless households without assistance).
- ❖ A strategy for developing additional permanent rental housing supply.
- ❖ A minimum financial contribution by the tenants.
- ❖ The projected rents are consistent with local market conditions.

2. Program design factors:

- ❖ Must specify the local market conditions that led to the choice of this option;
- ❖ May select families in accordance with written tenant selection policies and criteria that are consistent with the purposes of providing housing to extremely

- ❖ low, low or moderate income families and are reasonably related to preference rules established under section 6(c)(4)(A) of the Housing Act of 1937.
- ❖ May select eligible families currently residing in units that are designated for rehabilitation or acquisition with HOME funds without requiring that the family meet the written tenant selection policies and criteria. Families so selected may use the tenant-based assistance in the rehabilitated or acquired unit or in other qualified housing. These families must be required to use the tenant-based assistance within Colorado.
- ❖ May select eligible families currently residing in rental units that are designated for rehabilitation using HOME program funds without requiring that the family be placed on the PHA's Section 8 waiting list;
- ❖ Specify if the contract for assistance will be paid to the landlord or directly to the assisted family;
- ❖ Specify the length of time the assistance will be provided. The term of assistance may not exceed 24 months but may be renewed, subject to the availability of additional HOME funds and the required HOME match of twenty-five percent (25%) non-federal monies.
- ❖ May use HOME funds to provide loans or grants to eligible extremely low, low, or moderate-income families for security deposits as delineated in 24 CFR ? 92.210.
- ❖ Certify that in operating the program they will adhere to additional requirements as delineated in 24 CFR ? 92.211;
- ❖ Certify that the tenant will not pay more than thirty percent (30%) of his/her adjusted income for rent;
- ❖ Certify that the rent of the unit is reasonable as compared to rent charged for comparable unassisted units in the same area;
- ❖ Certify that housing occupied by a family receiving tenant-based assistance under the HOME program must meet Section 8 Housing Quality Standards; and,
- ❖ Certify that the amount of monthly assistance may not exceed the difference between 30% of the tenant's adjusted monthly income and the Section 8 Existing Fair Market Rent for the area, after adjustments for bedroom size.
- ❖ No project-based subsidy.

#### **IX. AFFIRMATIVE MARKETING PROCEDURES AND REQUIREMENTS**

The Department of Local Affairs, Division of Housing, will adopt the affirmative marketing procedures outlined below for HOME-assisted housing containing five (5) or more housing units and will require adoption by all grantees of affirmative marketing plans specific to local conditions. The procedures may include:

- ❖ Methods for informing the public, owners and potential tenants about Federal Fair Housing laws and the grantee's affirmative marketing policy. Suggested methods may include use of the Equal Housing Opportunity logotype or slogan in press releases and in solicitations for owners, distribution of the policy to media and interested public groups, and written communications to fair housing and other groups. Another method would be the display of the fair housing poster.
- ❖ Requirements and practices each owner will utilize in carrying out the affirmative marketing policy. Grantees may require owners to advertise vacant units in

newspapers of general circulation and minority media if available, to display the Equal Housing Opportunity logo or fair housing poster in rental offices, and/or to notify the PHA of vacant units.

- ❖ Procedures to be used by owners to inform and solicit applications from persons in the housing market area that are not likely to apply for the housing without special outreach. Special outreach may be undertaken, at the grantee's option, by individual owners or by the grantee on behalf of all owners. Special outreach may be accomplished through the following methods:
- ❖ Newspaper announcements in general circulation newspapers and/or ethnic, neighborhood, community, or school newspapers;
- ❖ Announcements in church or school bulletins, posters, or oral presentations to community organizations; and,
- ❖ Posters publicizing the program placed in grocery stores, job center sites, community centers, churches, schools, or other places where potential tenants may visit.

Each unit of general local government that subgrants the administration of this program must adopt affirmative marketing procedures and requirements that meet the requirement in paragraphs (a) and (b) of 24 CFR 92.351.

The grantee must maintain a file that contains copies of all marketing efforts and the records necessary to assess the results of these actions. This file will be inspected by the Division of Housing staff to evaluate the marketing efforts. The file should contain copies of newspaper ads, memos of phone calls, copies of letters and any other pertinent information.

The Division of Housing will monitor, at least annually, the compliance efforts made by its grantees and owners through review and approval of the affirmative marketing plans; comparison of predetermined occupancy goals to actual occupancy data that the owner will be required to maintain; and, review of outreach efforts on the part of the grantee and/or owners.

If the grantee and/or owner fail to follow the affirmative marketing requirements, corrective actions shall include extensive outreach efforts to appropriate contacts to achieve the occupancy goals or other actions the Division of Housing may deem necessary.

#### **X. MINORITY AND WOMEN BUSINESS OUTREACH PROGRAM**

In accordance with Section 281 of the HOME Investment Partnership Act and 24 CFR 92.350, the Department of Local Affairs, Division of Housing, will prescribe procedures acceptable to HUD to establish and oversee a minority outreach program. The program shall include minority and women-owned businesses in all contracting activities entered into by the state to facilitate the provision of affordable housing authorized under this Act or any other Federal housing law applicable to the state.

The Department of Local Affairs, Division of Housing will encourage the use of women and minority owned businesses in bids for the various programs throughout the state under the Colorado HOME program through coordination with the Governor's Minority Business Office established in 1989.

The outreach program, at a minimum, will consist of the following:

- ❖ Development of a systematic method for identifying and maintaining an inventory of certified minority and women's business enterprises (MBEs and WBEs), their capabilities, services, supplies and/or products;
- ❖ Usage of the local media, electronic and print, to market and promote contract and business opportunities for MBEs and WBEs;
- ❖ Development of informational and documentary materials (fact sheets, program guides, procurement forecasts, etc.) on contract/subcontract opportunities for MBEs and WBEs;
- ❖ Development of solicitation and procurement procedures that facilitate opportunities for MBEs and WBEs to participate as vendors and suppliers of goods and services;
- ❖ Sponsorship of business opportunity-related meetings, conferences, seminars, etc., with minority and women business organizations; and,
- ❖ All grantees and sub recipients will be required to maintain statistical data on the use and participation of minority and women business enterprises as contractor/subcontractors in HOME assisted program contracting activities. Owners will be required to identify projects that were bid by minority and women owned entities and the number of minorities or women hired as a result of activities undertaken using HOME funds.

#### HOME MATCHING REQUIREMENTS

The Division of Housing provides HUD with HOME match using State Loan funds spent on HOME eligible activities, local funding used in HOME projects, foundation funds used in HOME projects, and other HOME eligible match sources.

### Home Investment Program Activities, Objectives, Outcomes and Indicators

#### Create a Suitable Living Environment

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective:</u></b> <b><i>Meet community needs for homeless shelter and transitional housing beds</i></b>				
SL-1(3) Provide funding to create permanent supportive housing units for chronically homeless	Suitable Living Environment	Availability	Availability of suitable living environment	Number of units assisted FY07 8 FY08 8 FY09 8

## Create Decent Housing

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective:</u></b> <b><i>Preserve the existing supply of affordable rental housing</i></b>				
DH-1(2) Fund rehab only of existing affordable housing rental projects	Decent Housing	Availability	Availability for the purpose of providing decent housing	Number of households assisted FY 2007 60 FY 2008 60 FY 2009 60
<b><u>Long-Term Objective:</u></b> <b><i>Increase the supply of affordable rental housing to meet community needs</i></b>				
DH-2(1) Provide funding for new construction of rental units to increase the affordability of decent housing	Decent Housing	Affordability	Affordability for the purpose of creating decent housing	Number of units assisted FY 2007 500 FY 2008 500 FY 2009 500
DH-2(2) Provide funding for acquisition and rehab of rental units to create decent affordable housing	Decent Housing	Affordability	Affordability for the purpose of creating decent housing	Number of units assisted FY 2007 350 FY 2008 350 FY 2009 350
DH-2(3) Provide funding for tenant-based rental assistance for special needs populations or those below 30% AMI	Decent Housing	Affordability	Affordability for the purpose of creating decent housing	Number of units assisted FY 2007 50 FY 2008 50 FY 2009 50
DH-1(6) Fund Rental Assistance targeted to homeless, HIV-AIDS,	Decent Housing	Affordability	Affordability for the purpose of creating decent housing	Number of units assisted FY 2007 250 FY 2008 250 FY 2009 250
<b><u>Long-Term Objective:</u></b> <b><i>Increase home-ownership for low- and moderate-income households and minorities</i></b>				

DH-2(4) Fund Home-ownership opportunities for low-and moderate-income households and minorities to increase affordability of decent housing	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	Number of units assisted FY 2007 200 FY 2008 200 FY 2009 200
<b><u>Long-Term Objective:</u></b> <b><i>Preserve home-ownership for low- and moderate-income households and minorities</i></b>				
DH-1(1) Provide funding for single-family, owner-occupied housing rehab to preserve accessibility of decent housing for very low-, low- and moderate-income households	Decent Housing	Availability	Availability for the purpose of providing decent housing	Number of households assisted FY 2007 125 FY 2008 125 FY 2009 125
<b><u>Long-Term Objective</u></b> <b><i>Assist in creating an adequate supply of housing for persons with special needs coupled with services that increase independence</i></b>				
DH-1(4) Provide funding for permanent supportive housing units for special need populations, in(excluding chronically homeless and HIV/AIDS)	Decent Housing	Availability	Availability for the purpose of providing decent housing	Number of units assisted FY 2007 100 FY 2008 100 FY 2009 100
DH-1(8) Provide funding for permanent supportive units for chronically homeless	Decent Housing	Availability	Availability for the purpose of providing decent housing	Number of units assisted FY 2007 8 FY 2008 8 FY 2009 8
<b><u>Long-Term Objective</u></b> <b><i>Meet the need for housing facilities or shelter beds for homeless persons</i></b>				
DH-1(5) Provide funding for transitional housing	Creating a Suitable Living Environment	Accessibility	Accessibility for the purpose of providing suitable living environment	Number of units assisted 2007 35 2008 35 2009 35



## HOMELESS Specific Homeless Prevention Elements

### 1. Sources of Funds to Be Used in 2007 to Address and Prevent Homelessness

Funding Sources:	
McKinney Vento Homeless Assistance (SHP)	
Metropolitan Denver Homeless Initiative CoC	\$9,151,949
Homeward Pikes Peak CoC	\$1,166,800
Balance of State CoC	\$2,045,474
State Tax Check-off for Homeless Prevention	\$ 200,000
Emergency Shelter Grant (ESG)	\$1,018,277
Community Development Block Grant (CDBG)	\$ 250,000
HOME Partnership (for transitional housing)	\$ 300,000
State of Colorado Housing Development Grants (HDG)	\$ 400,000

### 2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.

The action plan will address the specific objectives of the Strategic Plan by targeting funding to meet the needs of communities for homeless transitional housing. CDH will continue to provide financial assistance to projects that create permanent supportive housing for chronically homeless individuals or families in coordination with the Continuums of Care.

**Potential development** of additional units of transitional housing includes:

- 5 TH beds Housing Justice! In Trinidad
- 2 TH beds Dept. of Social Services in Pagosa Springs
- 5 TH beds Pinon Project Cortez
- 7 TH beds VOA Durango

Obstacles to completing these action steps include lack of adequate funding for new projects within the Supportive Housing Program (SHP) funding stream. Due to the nature of their clientele, Transitional Housing projects require operating dollars to pay a portion of client rents that are often sporadic at best. While every effort is made to encourage client stability and promote employment, families often encounter seasonal or “start-stop” employment situations. There are barriers to the entry of new projects into the Continuum of Care system because funding is insufficient to support both renewal and new projects.

### 3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.

The action plan will address the specific objectives of the Strategic Plan by targeting funding to meet the needs of communities for permanent supportive housing for chronically homeless persons. Please see action steps below.

## ACTION STEPS

(1) CDH will coordinate with the three Colorado Continuums of Care (CoCs): Metropolitan Denver Homeless Initiative; Homeward Pikes Peak and the Balance of State; (2) CDH will continue to provide financial assistance to projects that create permanent supportive housing for chronically homeless individuals or families in coordination with those Continuums of Care; (3) CDH will fund nonprofit organizations using HOME, ESG, HOPWA and CDBG funding to assist with supportive services for chronically homeless persons.

**Potential development** of additional units of permanent supportive housing includes:

Develop new permanent supportive housing beds for chronically homeless persons:

10 PSH beds Grand Valley Catholic Outreach in Grand Junction

10 SRO beds in Lamar Housing Authority, Lamar

10 PSH beds Catholic Charities Northern, Weld County

7 SRO units for Persons with HIV/AIDS in Pueblo

Obstacles to completing these action steps include lack of adequate funding and agency capacity to develop housing solutions.

### **4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.**

CDH will continue activities to prevent homelessness, utilizing Emergency Shelter Grant (ESG) funding, Community Development Block Grant (CDBG) and possibly discretionary Community Services Block Grant dollars. In response to the extremely high foreclosure rate in the State of Colorado, CDH has implemented a “foreclosure prevention” program. Many of those facing foreclosure are households encountering predatory lending practices without a good understanding of the pitfalls of various loan products, without household budgeting skills, and unready for the responsibilities of homeownership. These households are at risk of homelessness. CDH will assist at least 1,000 households with foreclosure prevention counseling.

### **5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.**

CDH will participate in Colorado Interagency Council on Homelessness (CICH) which has a Discharge Coordination subcommittee to coordinate, facilitate and promote development and implementation of community wide-wide discharge planning policies. Their subcommittee facilitates meetings with city, county and state corrections officials, public hospital officials, community mental health centers, and the foster care system; shares community organizing and advocacy strategies among regional CoC groups and individual homeless service providers and provides information on best practices with participating agencies. While a statewide discharge coordination policy may be difficult to achieve, efforts are underway.

## Emergency Shelter Grants (ESG)

**(States only)** Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Please see item number “V” below “Allocation and Selection Criteria”

**GOAL.** The goal of the Colorado Emergency Shelter Grants (ESG) Program is to assist homeless persons by providing better facilities, a complete continuum of supportive services at emergency shelters/transitional housing programs and to assist potentially homeless persons by providing expanded prevention programs.

### Program Objectives

- ❖ To support the operating costs of emergency shelters.
- ❖ To assist in the prevention of homelessness.
- ❖ To assist in improving the quality and range of services necessary for a complete continuum of care that encourages self-sufficiency for the homeless.
- ❖ To increase the availability of emergency shelter and transitional housing programs.
- ❖ To include homeless families and individuals to the maximum practicable extent in maintaining, renovating, operating, and constructing homeless facilities.



### Program Strategies

The Colorado Division of Housing will employ four strategies in the 2007 Federal Fiscal Year in its allocation of **\$1,018,277** in ESG funds, those entities so choose. HUD has identified as a national priority the elimination of chronic homelessness. Colorado is taking serious aim at this target. Given the limited funding available, CDH may supplement with CDBG funds (2007 only), the homeless grant needs in *both entitlement and non-entitlement* areas, allowing us to expand homeless efforts. Priority will be given to projects that are consistent with the following strategies.

- ❖ In order to develop a comprehensive approach to the provision of emergency shelter and delivery of services for the homeless, the first program priority is to ensure that applicant agencies are leveraging all resources, including local, state, federal and private funding in the operation of a shelter and/or deliver of related prevention and essential services.
- ❖ The second strategy is to ensure that applicants make a significant contribution to the elimination of homelessness as documented statistically.
- ❖ The third strategy is to encourage programs to use a coordinated, case management approach to service delivery. Programs utilizing strong case management approaches that ensure the delivery of essential services along the continuum of care will receive priority consideration for funding.
- ❖ The fourth strategy is to encourage homelessness prevention through funding of programs that provide well-thought-out approaches to homelessness prevention.

## **II. Emergency Shelter Grant Utilization**

For FY 2007, it is anticipated that Colorado Division of Housing will receive an ESG allocation of at least **\$1,018,277.**

## **III. Eligibility**

Units of local government or nonprofit organizations within the State of Colorado are eligible to apply for Emergency Shelter Grant funding. Local governments may apply for assistance on behalf of nonprofit organizations or may deliver services directly. The State may distribute Emergency Shelter Grant funds directly to private nonprofit organizations.

If a nonprofit agency applies directly to the State for ESG funds, it is a federal requirement that they submit with their application a letter certifying approval of the application by the relevant unit of local government. In determining the relevant unit of local government for this certification, the local agency needs to determine its primary service area. If the primary service area is a town or city, the agency should seek approval of the town or city government. Programs whose primary service area is county wide or covers multiple towns and unincorporated areas, should ask approval of county governments. As a condition of grant award, applicants and grantees must complete the appropriate Emergency Shelter Grants Program Certifications, have proof of Internal Revenue Service (I.R.S.) 501(c) status, and submit current I.R.S. W-9 Federal tax identification forms.

### **Local certifications include:**

- ❖ Emergency Shelter Grant Program Assurances and Certifications;
- ❖ Certification of Local Approval for Nonprofit organizations;
- ❖ Certification of Exemption from requirements of the National Environmental Protection Act (See Environmental Review Section IX.), and;
- ❖ Certification of Consistency with the appropriate approved Consolidated Plan.

**NOTE:** The following entities have Consolidated Plans: Adams County; Arapahoe County; City of Arvada; City of Aurora; City of Boulder; City of Centennial; City of Colorado Springs; City and County of Denver; Douglas County; City of Fort Collins; City of Greeley; City of Grand Junction, Jefferson County; City of Lakewood; City of Longmont; City of Loveland; City of Pueblo, Pueblo County; and the City of Westminster. ESG applicants from these areas will obtain Certifications of Consistency with Consolidated Plan from these jurisdictions. The CDH will provide Certifications of Consistency with the Consolidated Plan for ESG applicants located in non-entitlement areas.

### **State Certifications include:**

- ❖ Emergency Shelter Grant Assurances and Certifications Program;
- ❖ Prohibition of the use of federal funds for lobbying certification;
- ❖ Certification of consistency with the 2005-2010 Colorado Consolidated Plan.

#### **IV. Eligible Activities**

The activities listed below are eligible for funding under the Emergency Shelter Grant Program.

- ❖ Payment for costs of operation and maintenance which include such items as insurance, utilities, operating staff, and furnishings;
- ❖ Essential services;
- ❖ Homeless prevention services;
- ❖ Grant administration (for local governments or subdivisions thereof).

ESG grant activity caps on eligible activities are: 30% cap on essential services; 30% cap on homeless prevention services; 10% cap on staff operations; 5% cap on administration.

#### **V. Allocation and Selection Criteria**

The State will prioritize projects in ESG non-entitlement jurisdictions (for ESG funding vs. CDBG Funding); however the State may elect to utilize Community Development Block Grant (CDBG) funding for homeless services in lieu of ESG funding in more non-Metropolitan Denver. The State will utilize an RFP process in 2007 with applications due to CDH by April 1, 2007. However, up to \$40,000 in ESG funding may be awarded by the Executive Director of the Department of Local Affairs on a discretionary basis to qualified recipients.

All applicants must prioritize the activities for which they are requesting funding and are encouraged to develop programs that address supportive service needs and homelessness prevention in addition to covering basic operating expenses. Both internal and external (grant review committee) analysis will judge how well proposed projects meet evaluation criteria.

The evaluation and scoring of points will be based upon the following criteria/and or assumptions:

- 1) The extent and urgency of the identified homeless needs; 10 points
- 2) The level of funding support for the applicant (Agency has sufficient funds to address the needs); 10 points
- 3) Leverage of resources (local, state, federal and charitable investment in the organization); 10 points
- 4) The capacity of the local government and/or nonprofit organizations to carry out the project(s). For existing subgrantees, we will take into account monitoring issues and track record on accuracy and timeliness of reports (compliance). The capacity of new applicants will be assessed by CDH housing development staff through its pro/con process; 10 points
- 5) The anticipated project impact upon the identified needs; 10 points
- 6) Cooperation/participation with the Continuum of Care; 10 points
- 7) The commitment to provide coordinated essential services and homelessness prevention activities within the applicant organization and in cooperation with other local nonprofit and governmental service providers (e.g. case

management, centralized intake, a voucher system to assure payment for services provided by outside organizations); 10 points

- 8) The location of the service organization (geographic distribution); 10 points
- 9) Current compliance with Homeless Management Information Systems (HMIS) for prior-funded projects or capacity to comply for new applicants; 10 points
- 10) Application's timeliness, accuracy, and compliance with HUD regulations about requests for specific categories, i.e., requests for staff operating, essential services, and homeless prevention dollars.

Program requirements will be the same for CDBG-funded homeless service projects and ESG-funded projects. The funding cycles will also be the same. All applicants must show at least a dollar-for-dollar, or 1:1 match for ESG funds requested.

## **VI. Reallocation**

Any local government or nonprofit organization that fails to enter into a contract within sixty (60) days from the date of the award notice will subject their award to recapture and reallocation. Additionally, any local government or nonprofit organization that fails to request reimbursement for eligible activities within sixty (60) days from the contract execution date will subject their funds to recapture and reallocation.

## **VII. Monitoring And Reporting**

Each local government or nonprofit agency receiving grant funds will submit to the State a quarterly report about accomplishments and expenditures. Quarterly reports will be due 20 calendar days after the end of each quarter. The State will perform grantee monitoring and provide required reports to HUD.

## **VIII. Environmental Review**

Colorado assumes federal responsibility for assessing environmental effects of the proposed Emergency Shelter Grant activities in accordance with 104(g), Housing and Community Development Act of 1974, [procedural provisions of the National Environmental Protection Act (NEA)], and regulations contained in 24 CFR Part 58. Unless the project involves rehabilitation, conversion, or major repairs, repairs with costs greater than \$500, project activities are exempt from NEA requirements.

## **IX. Homeless Management Information System (HMIS)**

Colorado will continue to implement HMIS through training activities conducted with subgrantees in 2007. Requirements for subgrantee participation in HMIS will be secured through a statement of "Assurances and Certifications" that must be signed by each subgrantee. HMIS Systems Operators for each of Colorado's three Continuums of Care will issue Compliant Agencies Lists that certify that each agency funded with ESG funding is compliant with HMIS.

## **X. Projected Emergency Shelter Grant Schedule (Subject To Change)**

March 1, 2007	ESG Notice of Funding Availability published
April 3, 2007	ESG application deadline
April 15, 2007	Committee Review of Applications
April 30, 2007	ESG Awards determined
June 18, 2007	ESG Training
July 1, 2007	Effective starting date of FY 2007 funding

## Emergency Shelter, Activities, Objectives and Outcomes

### Create a Suitable Living Environment

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective:</u></b> <b><i>Meet community needs for homeless transitional housing</i></b>				
SL-1(1) Provide funding for operations and essential services of emergency shelter or transitional housing to ensure availability of a suitable living environment	Creating a Suitable Living Environment	Accessibility	Accessibility for the purpose of providing suitable living environment	Number of homeless people assisted 2007 1000 2008 1000 2009 1000

### Create Decent Housing

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective:</u></b> <b><i>Prevent Homelessness</i></b>				
DH-2(5) Provide ESG funding to qualifying nonprofit organizations to prevent homelessness and ensure decent, affordable housing	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	Number of households assisted FY 2007 600 FY 2008 600 FY 2009 600

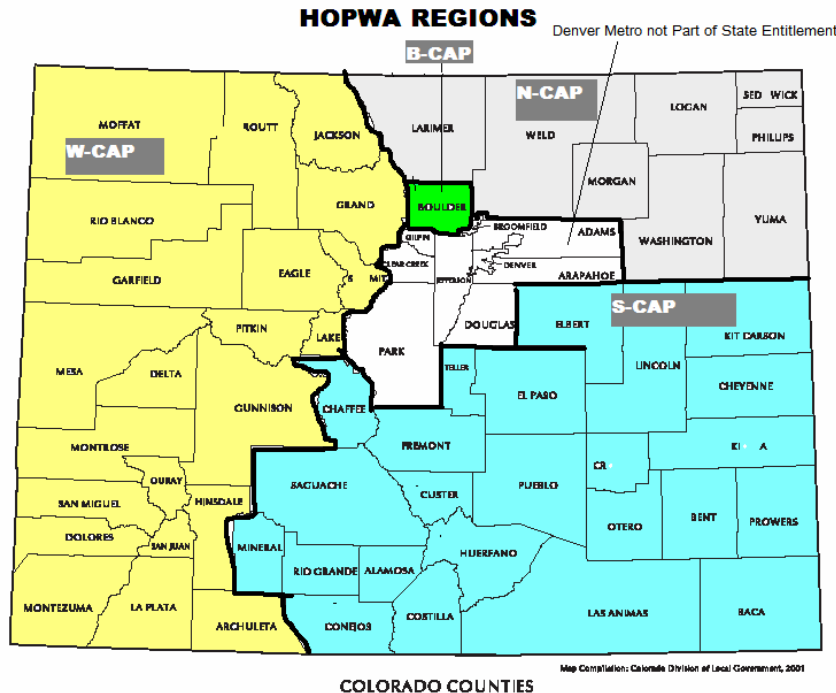
## Housing Opportunities for People with AIDS

1. Provide a Brief description of the organization, service area, program contacts, and an overview of the range/type of housing activities to be done.

The Colorado AIDS Project is the subgrantee organization for HOPWA in the "Balance of State", outside of the Denver Metropolitan area of Colorado. The Colorado AIDS Project (CAP) was founded in 1983 as the first community-wide response to the HIV/AIDS crisis. Today, CAP coordinates with four other CAP programs and is the fiscal agent for the State grant. Eligible activities include Tenant Based Rental Assistance, Supportive Services, Short Term Rent and Mortgage (STRMU), Permanent Housing Placement, Housing Information, and Resource Identification/TA.

Colorado AIDS Project Contact: Laurie Tomlinson  
 Northern Colorado AIDS Project (N-CAP) Contact: Sondra Chessare  
 Boulder Colorado AIDS Project (B-CAP) Contact: Christopher Smith  
 Southern Colorado AIDS Project Contact (S-CAP): Linda J. Boedeker  
 Western Slope Colorado AIDS Project (W-CAP) Contact: Jo Rosenquist





**2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.**

The State used its HOPWA dollars to provide housing information and resource identification as well as supportive services to clients that need supportive housing but are not homeless.

**3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.**

The supportive service needs of all persons with HIV/AIDS (both homeless and at risk of homelessness) are addressed largely through case management at statewide subgrantee agencies. This HOPWA-funded case management assists clients in obtaining public benefits, mainstream resources, supportive housing, emergency financial assistance, access to primary care and other supportive services

**4. Report on annual HOPWA output goals for the number of households assisted during the year in:**

**(1) short-term rent, mortgage and utility payments to avoid homelessness:**

27 persons with HIV/AIDS and 16 other family members;

**(2) rental assistance programs:** 103 persons with HIV/AIDS and 59 other family members.

**(3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.**

The State uses HOPWA dollars for tenant based rental assistance, supportive services and STRMU and does not generally use dollars for housing development or operation

of facilities. There are not enough dollars to do so and still be able to house other people with need.

**5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.**

Committed leverage from other public and private resources that helped address needs identified in the plan include HOME, CDBG and ESG. Colorado is learning how to better coordinate the needs of HOPWA clients with other mainstream funding resources.

**6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.**

HOPWA funds were distributed as planned and were consistent with the Consolidated plan. Most regions experience more need than resources available to meet the need.

**7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.**

Barriers encountered in HOPWA-funded service delivery are often related to transportation in the rural areas. Clients have difficulty getting to and from the agency and case managers often travel hundreds of miles each month to reach their clients. Another challenge noted by statewide HOPWA providers is the cost of housing in the resort areas they serve. Subsidies run high which results in serving fewer families than they might otherwise. Staff turnover is another challenge. Ongoing training of new staff in HOPWA/HUD requirements and excellent service delivery is a must. Over the past summer Colorado AIDS Project conducted on-site training at Boulder County AIDS Project, Southern Colorado AIDS Project and Northern Colorado Aids Project for new staff.

**8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.**

In June, the Centers for Disease Control and Prevention announced at its National HIV Prevention Conference that about 1.1 million people living in the United States are HIV-positive, the highest number ever recorded in the country. AIDS Action reports that there have been nearly 8,000 AIDS cases in Colorado since the start of the epidemic, as of the end of 2003. Nearly 5,000 cases have been in Denver County.

Since the beginning of the epidemic, community organizations have been on the front lines offering information on how to prevent HIV and AIDS and providing services to those affected with the disease. Additionally we have seen a rise of organizations dedicated to reaching groups that are hardest hit by AIDS, particularly women and minorities.

Health plans are also playing an important role in this fight. With their wide networks of doctors and hospitals, health plans can help those living with HIV and AIDS identify an HIV specialist with whom they feel comfortable. In addition, health plans can put patients in touch with case managers who can help them keep track of medical appointments, tests and prescriptions.

**9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.**

No formal program evaluations have been planned (mostly because there is no funding for such). Ongoing training and internal monitoring visits are planned. Colorado AIDS Project will conduct quarterly meetings and file reviews with all agencies in an effort to improve the overall program.

**Action Plan HOPWA response:**

**RESOURCES:**

**Describe how Federal, State, and local and private-sector resources will be used to address identified needs for the year covered by the Action Plan.**

HOPWA funding is available for the following activities: rental assistance, supportive services, operating expenses, housing information and resource identification, short-term rent and utilities. Grants for creation of units may be funded by CDH through Community Development Block Grant (nonentitlement areas), HOME, Permanent Supportive Housing, Supportive Housing for Persons with Disabilities (Section 811), Federal Low Income Housing Tax Credits, and other federal, state and local funding sources, HUD Section 8 and Section 8 Homeownership programs.

Funding Sources:	
Housing Opportunities for Persons with AIDS (HOPWA)	\$364,000
Housing Opportunities for Persons with AIDS (HOPWA) Competitive	\$100,000
Ryan White Funding	unknown
Local Government Contributions	unknown
Private Donations	unknown
Emergency Shelter Grant (ESG)	\$1,018,277
Community Development Block Grant (CDBG)	\$ 250,000
HOME Partnership (for transitional housing)	\$ 300,000
State of Colorado Housing Development Grants (HDG)	\$ 400,000

## Specific HOPWA Objectives

### Create Decent Housing

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective</u></b> <i>Assist in creating an adequate supply of housing for persons w/ special needs coupled with services that increase independence</i>				
DH-1(6) Fund Rental Assistance targeted to HIV-AIDS households to ensure that decent housing is affordable	Decent Housing	Affordability	Affordability for the purpose of creating decent housing	Number of households assisted FY 2007 75 FY 2008 75 FY 2009 75
DH-2(5) Fund short-term rent, mortgage and utility assistance that promotes housing stability and ensures that decent housing is affordable	Decent Housing	Affordability	Affordability for the purpose of creating decent housing	Number of households assisted FY 2007 20 FY 2008 20 FY 2009 20
DH-1(3) Fund housing information and resource identification services that make decent housing more accessible to persons with HIV/AIDS	Decent Housing	Availability	Availability for the purpose of creating decent housing	Number of households assisted FY 2007 20 FY 2008 20 FY 2009 20

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective</u></b> <i>Provide funding for supportive services that foster independence</i>				
SL-1(1) Provide funding for supportive services for HIV/AIDS clients to create housing stability and foster independence	Decent Housing	Availability	Availability for the purpose of providing decent housing	Number of clients assisted FY 2007 60 FY 2008 60 FY 2009 60

## Housing Opportunities for People With Aids (HOPWA) Formula Program

### I. Program Description

The Colorado Division of Housing expects to receive \$360,000 in HOPWA funding from HUD and will work with a consortium of four Colorado Aids Project (CAP) agencies to distribute assistance for persons living with HIV/AIDS. These funds may be used to provide tenant-based rental assistance, emergency assistance, and/or to provide housing coordination services and supportive services to persons/families living with HIV/AIDS.

## **II. Program Services**

HOPWA funding will be used to assist clients in accessing housing and related supportive services. Funds will be used to enable low-income persons living with HIV and their families in Colorado to achieve housing stability and access to health-care and related supportive services.

## **III. Funding Allocations**

In determining distribution of the expected \$364,000 allocated to the State of Colorado for federal fiscal year 2007, the Division of Housing is working with a consortium of four Colorado Aids Project (CAP) agencies to assess the required levels of funding for rental and emergency assistance and supportive services across CAP areas based on current trends and historic need (CAP regions reflect recent entitlement changes). We utilize recommendations from this consortium in making awards. Applicants will be HOPWA-eligible organizations or projects. The Division of Housing will also take a small amount of funding for administrative costs.

## **IV. Program Oversight**

The Division of Housing will have oversight of the grant. All spending caps on administration of this grant will be observed.

## **V. Program Objectives**

The department will follow the reporting system established by HUD for the HOPWA program and report program outcomes according to the following outcome measures:

- Increase the number of eligible clients/households able to establish and better maintain suitable stable housing.
- Improve accessibility to health care and other support services for eligible clients/households.
- Reduce the risk of homelessness for individuals/families living with HIV/AIDS.

## Small Cities Community Development Block Grant

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

The state does not prioritize non housing community development needs eligible for assistance. Rather, it funds projects based on the priorities of local governments as applications are submitted for funding. Please refer to the state's method of distribution for specific the project evaluation criteria used for economic development and public facility projects.

2. Does the Plan include a Neighborhood Revitalization Strategy or Target Area where activities are carried out in a concentrated manner?

The state does not have neighborhood revitalization/target areas for CDBG funding.

3. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), in accordance with the statutory goals and the primary CDBG objective to provide decent housing, a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

### Create a Suitable Living Environment

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective:</u></b> <b><i>Help communities identify, prioritize and address their capital improvement needs</i></b>				
SL-3(1) Fund acquisition of property for use as public facility to help create or maintain a suitable living environment	Creating a Suitable Living Environment	Sustainability	Sustainability for the purpose of creating suitable living environments	Number low/moderate income people having access to public facilities in their neighborhood 2007 1,200 2008 1,200 2009 1,200
SL-3(2) Provide funding for construction or reconstruction of public facilities that primarily benefit low/moderate income persons	Creating a Suitable Living Environment	Sustainability	Sustainability for the purpose of creating suitable living environments	Number persons served as a result of the public facility improvements or construction 2007 15,000 2008 15,000 2009 15,000  Number of public facilities

				constructed and improved 2007 8 2008 8 2009 8
SL-3(3) Provide funds for planning/capacity building related to infrastructure and capital improvements	Creating a Suitable Living Environment	Sustainability	Sustainability to create suitable living environments	Number persons benefiting as a result of the planning 2007 1,000 2008 1,000 2009 1,000
<b><u>Long-Term Objective:</u></b> <b><u>Meet community needs for shelter beds</u></b>				
SL-1(2) Provide funds to create/preserve emergency shelter to ensure accessibility to a suitable living environment	Creating a Suitable Living Environment	Accessibility	Accessibility to provide a suitable living environment	Number homeless shelter beds assisted 2007 25 2008 25 2009 75
SL-1(2) Fund essential services and shelter operations with CDBG to increase/retain access to a suitable living environment	Creating a Suitable Living Environment	Accessibility	Accessibility for the purpose of providing suitable living environment	Number homeless shelter beds assisted 2007 100 2008 100 2009 100

### Create Decent Housing

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective:</u></b> <b><u>Preserve the existing supply of affordable rental housing</u></b>				
DH-1(2) Fund rehab only of existing affordable housing rental projects	Decent Housing	Availability	Availability for the purpose of providing decent housing	Number of households assisted (For unit goals refer to HOME section)
<b><u>Long-Term Objective:</u></b> <b><u>Increase the supply of affordable rental housing to meet community needs</u></b>				
DH-2(2) Provide funds for Acquisition and rehab of rental units to create decent affordable housing	Decent Housing	Affordability	Affordability to create decent housing	Number of units assisted (For unit goals refer to HOME section)
<b><u>Long-Term Objective:</u></b> <b><u>Increase home-ownership for low/mod-income</u></b>				



<b><i>households and minorities</i></b>				
DH-2(4) Fund Homeownership for low-and moderate-income households and minorities to make decent housing affordable	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	Number of units assisted (For unit goals refer to HOME section)
<b><u>Long-Term Objective:</u></b> <b><i>Preserve home-ownership for low-and moderate-income households and minorities</i></b>				
DH-1(1) Provide rehab funding for single-family, owner-occupied housing to preserve accessibility of decent housing for very low-, low- and moderate-income households	Decent Housing	Availability	Availability for the purpose of providing decent housing	Number of households assisted (For unit goals refer to HOME section)
DH-2(5) Provide funds to prevent homeless and ensure decent affordable housing	Decent Housing	Affordability	Affordability for the purpose of providing decent housing	Number of persons avoiding homelessness FY 2007 600 FY 2008 600 FY 2009 600
DH-3(1) Provide funds for foreclosure prevention activities throughout the state to sustain decent affordable housing	Decent Housing	Sustainability	Sustainability for the purpose of preserving decent housing	Number of households avoiding foreclosure as a result of assistance FY 2007 1,000 FY 2008 1,000 FY 2009 1,000
<b><u>Long-Term Objective</u></b> <b><i>Create an adequate supply of special needs housing with supportive services to increase independence</i></b>				
DH-1(4) Provide funds for permanent supportive housing units for special need populations,	Decent Housing	Availability	Availability for the purpose of providing decent housing	Number of units assisted (For unit goals refer to HOME section)

### Create Economic Opportunity

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective:</u></b> <b><i>Provide financial and</i></b>				

<b><i>technical assistance to businesses to create or retain jobs</i></b>				
EO-3(1) Provide financial assistance to business loan funds that provide funds for technical assistance and economic development activities that focus on creating or sustaining jobs.	Expanded Economic Opportunity	Sustainability	Create livable communities by sustaining economic opportunity	Number of jobs created or retained FY 2007 100 FY 2008 100 FY 2009 100
EO-3(2) Fund public infrastructure for businesses to create or retain jobs	Expanded Economic Opportunity	Sustainability	Create livable communities by sustaining economic opportunity	Number of jobs created or retained FY 2007 96 FY 2008 96 FY 2009 96
EO-3(3) Provide funding for completion of planning or feasibility studies for businesses or industries that will create or retain jobs	Expanded Economic Opportunity	Sustainability	Create Livable communities by sustaining economic opportunity	Number of jobs created or retained FY 2007 4 FY 2008 4 FY 2009 4

## I. Foreword

The State of Colorado, through the Colorado Governor's Office of Economic Development and International Trade (OEDIT), and the Department of Local Affairs, will administer the "Small Cities" Community Development Block Grant (CDBG) program for non-entitlement jurisdictions of the State for Federal Fiscal Year 2007.

Local-State discussions of state administration of the CDBG program began in 1981 and resulted in the State opting to assume the responsibility for administration of the program starting in federal Fiscal Year 1983. These discussions have continued each year and have consisted of a direct consultation process with local governments and the public, including at least one public hearing each year, and deliberations with advisory groups. The State CDBG program, as presented in this document, represents the collective effort of all the individuals, local governments and organizations that have participated in its development. While unanimity may not have been achieved on all issues, constructive compromises and agreements were generally realized. The time and effort committed by all who have participated in the development and refinement of the program is greatly appreciated.

The Colorado Governor's Office of Economic Development and International Trade is responsible for all projects involving the use of CDBG funds to provide financing for private for-profit businesses, with one exception. The exception is the case in which the financing for a private, for-profit business is for the rehabilitation of non-residential properties when such properties are integral parts of local government sanctioned and planned community redevelopment efforts or when such properties are of key historic or commercial importance to a community or neighborhood. The Division of Local Government is responsible for this type of rehabilitation and for all other eligible CDBG project activities, including housing, public facilities and community development. The Department's Division of Housing has "lead" responsibility for housing and homeless assistance projects funded through the

program. The Financial Services section of the Department's Division of Local Government (DLG) is responsible for CDBG-assisted public facilities and community development projects as well as overall coordination of the State's CDBG program. Appropriate State staff can be reached at the following numbers:

Colorado Governor's Office of Economic Development and International Trade (Denver)			(303) 892-3840
Department of Local Affairs – TDD			(303) 866-5300
Division of Housing (Central Number)			(303) 866-2033
Field Offices – Denver		Doug Selbee	(303) 866-5577
		Denise Selders	(303) 866-6450
		Antoinette Estrada	(303) 866-3781
		Ann Watts	(303) 866-4652
	Pueblo	Rick Hanger	(719) 544-2466
	Grand Junction	Bill Whaley	(970) 248-7302
Division of Local Government		Teri Davis	(303) 866-4462
Field Offices –Golden		Clay Brown	(303) 273-1787
	Durango	Ken Charles	(970) 247-7311
	Sterling	Vacant	
	Grand Junction	Jack Kirtland	(970) 248-7333
	Loveland	Don Sandoval	(970) 679-4501
	Pueblo	Lee Merkel	(719) 544-6577
	Monte Vista	Debra Downs	(719) 852-9429
	Silverthorne	Vacant	(970) 668-6160

## II. Introduction

The federal Community Development Block Grant (CDBG) program was established by the Housing and Community Development Act of 1974. The program is designed to help communities meet their greatest community development and redevelopment needs, with particular emphasis on assisting persons of low and moderate income. The overall program consists of two major elements:

- ❖ **The "entitlement" program.** This portion of the overall program is administered by the U.S. Department of Housing and Urban Development (HUD) and provides assistance to communities that are "entitled" to CDBG funds by virtue of their size or metropolitan status. Essentially, entitlement communities are those cities which are within a metropolitan area and which have a population of 50,000 or more or are designated as a "central city," and those counties which are within a metropolitan area and which have a combined population of 200,000 or more in their unincorporated areas and non-entitlement municipalities. There are currently 16 entitlement jurisdictions in Colorado: Adams County (unincorporated areas and Bennett, Broomfield, Brighton, Federal Heights, Northglenn and Thornton), Arapahoe County (unincorporated areas and Bow Mar, Centennial, Cherry Hills Village, Columbine Valley, Deer Trail, Englewood, Glendale, Greenwood Village, Littleton, and Sheridan), Douglas County (unincorporated areas and Castle Rock, Larkspur, Lone Tree and Parker) and Jefferson County (unincorporated areas and Arvada, Edgewater, Golden, Mountain View, and Wheat Ridge), Aurora, Boulder, Colorado Springs, Denver, Fort Collins, Grand Junction, Greeley, Lakewood, Longmont, Loveland, Pueblo and Westminster.
- ❖ **The "non-entitlement," or "Small Cities," program.** This portion of the overall program provides assistance to those communities who do not qualify for

the entitlement program. The State assumed responsibility for administration of this portion of the CDBG program starting in federal Fiscal Year 1983.

## **Review and Comment by Local Governments and Citizens**

The State's annual Performance and Evaluation Reports provide a basis for review and comment on the performance of the State. Pursuant to the State open records law and the federal CDBG law, records on use of any prior year and future Small Cities CDBG funds by the State or a local government or recipient must be available for access by citizens and units of general local government. The State's records are available through the Department of Local Affairs, 1313 Sherman Street, Room 521, Denver, Colorado. These records may be examined in the State's offices and copies may be obtained for a fee during regular working hours.

The State will provide to citizens and to units of general local government reasonable notice of, and an opportunity to comment on, any proposed substantial changes in these Program Guidelines or in the use of CDBG funds.

## **Compliance with Federal and State Requirements**

These Program Guidelines and grantee guidance have been developed to comply with all existing federal requirements. When revised federal regulations for the state-administered "Small Cities" program are published for effect, those new regulations and any subsequent changes in the law, regulations or policy will govern in the event of any inconsistencies with these Program Guidelines.

The program design also takes into account that, in administering the program, the State and local applicants and grantees must assume responsibility for assuring compliance with many federal and State laws and regulations that apply to the CDBG program. A brief description of some of the applicable federal requirements is included in Section VIII.

### **III. Goal And Objectives**

#### **COMMUNITY DEVELOPMENT**

- 4. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by eligibility category specified in the CDBG Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.**

**Goal:** Colorado's goal in administering the CDBG program is to establish a program that is responsive to local community development needs, strategies and priorities, and that produces a measurable improvement in the communities served by the program.

**Primary Objective:** The primary objective of the State's program is the development of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. Consistent with this primary objective, not less than seventy percent (70%) of federal Fiscal Years 2005, 2006, and 2007 funds

and State program income will be used for project activities that benefit persons of low and moderate income.

**Broad Objectives:** The federal Housing and Community Development Act of 1974 establishes three broad national objectives for the CDBG program:

- ❖ Benefit persons of low and moderate income;
- ❖ Prevent or eliminate slums or blight; and
- ❖ Address other urgent needs.

The primary objective of the State's program will be achieved through a program that gives maximum feasible priority to funding activities that benefit persons of low and moderate income or aid in the prevention or elimination of slums or blight. Funding may also be provided for activities which grantees certify meet other community development needs that have arisen during the preceding 18-month period and have a particular urgency.

Additionally, it is the intent of the State and of Congress that CDBG funds not be used to reduce substantially the amount of local financial support for community development activities below the level of such support prior to the availability of CDBG assistance.

## **Benefit to Persons of Low and Moderate Income**

Except as otherwise specified in federal law and regulations, a local project activity will be determined to address the broad national objective of "benefit to persons of low and moderate income" if not less than fifty-one percent (51%) of the beneficiaries of the CDBG-funded project activity are low and moderate income persons.

Low and moderate-income persons are defined as persons who are members of households (families for economic development purposes) whose annual incomes do not exceed HUD-prescribed income limits, which are based on eighty percent (80%) of median family income. Those income limits are posted on our web-site at: [http://www.dola.state.co.us/dlg/ga/cdbg/index.html#max\\_income](http://www.dola.state.co.us/dlg/ga/cdbg/index.html#max_income)

## **Prevention or Elimination of Slums or Blight**

Contained in Section X are the requirements that must be met in determining that a project activity meets the broad national objective of "prevention or elimination of slums or blight." For the purpose of determining whether a local project activity addresses this broad national objective, the definition of "slum" is the definition of "slum area" contained in 31-25-103 C.R.S., as amended, and, similarly, the definition of "blight" is the definition of "blighted area" contained in 31-25-103, C.R.S., as amended.

## **Address Other Urgent Needs**

To comply with the national objective of meeting community development needs having a particular urgency, an activity will be considered to address this objective if the applicant certifies that conditions exist which:

- ❖ pose a serious and immediate threat to the health or welfare of the community,
- ❖ are of recent origin or recently became urgent,

- ❖ the grantee is unable to finance on its own; and
  - ❖ other resources of funds are not available.
- A condition will be considered to be of recent origin if it developed or became critical within 18 months preceding the grantee's certification.

#### **IV. Eligible Activities and Recipients**

**Eligible Activities and Recipients:** Eligible activities and services under the State CDBG program are those which:

- ❖ are consistent with the program goal and objectives stated above; and
- ❖ are included as eligible activities under Section 105 of Title I of the Housing and Community Development Act of 1974, as amended, and are otherwise eligible under other sections of Title I and under detailed federal regulations. Excerpts from Section 105 and other sections of the federal CDBG law relevant to activity eligibility are presented in the Eligible Activities Section.

Activities which involve involuntary, permanent displacement of persons are not ineligible; however, it is a federal requirement that local plans and policies be established to minimize involuntary, permanent displacement; replace low/moderate-income dwelling units demolished or converted to another use as a direct result of CDBG assistance; and assist persons actually displaced as a result of CDBG-assisted activities.

The State has certified to HUD that it will not refuse to distribute the CDBG funds to any unit of general local government on the basis of the particular eligible activity selected by such unit of general local government to meet its community development needs, except that this does not prevent the State from establishing priorities in distributing the CDBG funds on the basis of the activities selected.

**Eligible Recipients:** Except for CDBG funding for homeless services (see below) eligible recipients are those municipalities and counties not eligible for federal "entitlement" CDBG funds; that is, eligible recipients are all municipalities and counties except: Adams County (unincorporated areas and Bennett, Broomfield, Brighton, Federal Heights, Northglenn and Thornton), Arapahoe County (unincorporated areas and Bow Mar, Centennial, Cherry Hills Village, Columbine Valley, Deer Trail, Englewood, Glendale, Greenwood Village, Littleton, and Sheridan), Douglas County (unincorporated areas and Castle Rock, Larkspur, Lone Tree, and Parker), Jefferson County (unincorporated areas and Arvada, Edgewater, Golden, Lakewood, Mountain View, and Wheat Ridge), Aurora, Boulder, Colorado Springs, Denver, Fort Collins, Grand Junction, Greeley, Lakewood, Longmont, Loveland, Pueblo and Westminster.

- ❖ Per HUD's definition of homelessness, a homeless person lacks a fixed, regular place to live: "A person is considered homeless when he/she resides in one of the places described below:
- ❖ a. in places not meant for human habitation, such as cars, parks, sidewalks, and abandoned buildings;
- ❖ b. in an emergency shelter;
- ❖ c. in transitional or supportive housing for homeless persons who originally came

from the streets or emergency shelter;

- ❖ d. in any of the above places, but is spending a short time (up to 30 consecutive days) in a hospital or other institution;
- ❖ e. is being evicted within a week from a private dwelling unit and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing; or
- ❖ f. is being discharged within a week from an institution in which the person has been a resident for more than 30 days and no subsequent residence has been identified and he/she lacks the resources and support networks needed to obtain housing."

The Division of Housing hereby finds that the homeless do not have a specific address.

Homeless persons have no home and can be considered residents of the non-entitlement areas of the state. Therefore, DOLA may provide CDBG funds to shelter facilities in the entitlement areas of the State of Colorado.

The State encourages arrangements between and among eligible entities that will ensure adequate provision of common or related community development activities and services. Also, municipalities and counties may contract with other entities or parties (Councils of Governments, Regional Planning Districts, Special Districts, Local Development Corporations, Downtown Development Authorities, Urban Renewal Authorities, Housing Authorities, non-profit corporations, etc.) to carry out project activities as provided for under statutes (including 31-51-101 (1) (c), 30-11-101 (1) (d), 29-1-203 and 29- 1-204.5, C.R.S., as amended), ordinances and resolutions, and State and local financial management procedures.

## **Multi-Jurisdictional Projects**

A "multi-jurisdictional" project is one in which two or more municipalities and/or counties carry out an activity or set of closely-connected activities that address an identified common problem or need. The following specific requirements must be met in multi-jurisdictional projects:

- ❖ One of the participating municipalities or counties must be authorized by the other participating municipalities or counties to act in a representative capacity for all of the participants. This designated entity must assume overall responsibility for ensuring the entire project is carried out in accordance with all program requirements. The overall responsibility and any related individual responsibilities must be specified in a legally binding cooperation agreement between the designated entity and all other directly participating municipalities and counties.
- ❖ To meet the citizen participation requirements of Section 104(a)(2) of the Housing and Community Development Act of 1974 ("the Act"), as amended, all the requirements listed in paragraph 2 of "Grantee Responsibilities" must be met, including the requirements that:
- ❖ Each participating jurisdiction must hold a public hearing; and
- ❖ The proposed and final project plan/application for the combination of project participants must be made available in each of the participating jurisdictions.
- ❖ To meet the citizen participation requirements of Section 104(a)(3) of the Act, each participating jurisdiction must have and follow a detailed citizen



participation plan (or certify that it is complying with the state's plan which addresses the six areas of concern specified in paragraph 3 of "Grantee Responsibilities").

- ❖ To meet the requirements of Section 104(d) of the Act, each participating jurisdiction must have and follow a Residential anti-displacement and relocation assistance plan. (See paragraph 5 of "Grantee Responsibilities.")
- ❖ To meet the requirements of Section 106(d)(5) of the Act, each participating jurisdiction must make and comply with the displacement, fair housing and other certifications described in paragraphs 6, 7, and 8 of "Grantee Responsibilities".)

## **V. Method Of Funds Distribution**

Approximately \$11,120,921 in FFY 2006 funds is expected to be allocated to the State for the 2007 program. Of this amount, about \$10,687,294 will be available for commitment to local projects, and about \$322,418 will be available to the State for its administration of the program. Any unobligated prior years funds, for local projects will also be available for commitment to local projects, as well as any committed funds which may be subsequently recovered by the State and any additional funds which may be awarded to the State by HUD, less the State administration allowance.

Program income is defined as gross income generated from the use of CDBG funds received by a grantee or a sub-recipient of a unit of local government. Currently, the state does not have, nor does it anticipate funding, any projects that generate program income. Should a project that generates program income be funded within the state's twelve (12) month program year, those funds, less the State administration allowance, will be directly available for commitment to projects, or will be set-aside by the State in a revolving loan fund for commitment to projects that generate program income. Grant sub-recipients will be allowed to retain program income if it can be demonstrated to the satisfaction of the State that the program income will continue to be used to finance projects of the same type and adequate capacity to administer the funds. The state will use up to two percent (2%) of locally retained program income for state program administration expenses. Any available funds that are not committed, including funds set-aside from program income payments, will be carried forward for commitment during a subsequent period.

Activities carried out by neighborhood-based non-profit organizations, local development corporations, or nonprofit organizations serving the development needs of communities in non-entitlement areas of the state are exempt from program income requirements. Income derived from these activities is deemed "miscellaneous" and must be retained by the sub-recipient to continue financing projects of the same type under a revolving loan fund. Currently, the majority of existing contracts the state has with local governments for housing rehabilitation and business-financing projects are with qualifying non-profit organizations. The State requires income to be used for additional housing and business financing activities. This income is dedicated to the revolving fund created solely for the specific housing rehabilitation or economic development activity.

In FFY 2007, the state will use up to one percent (1%) of the amount of the amount available to the state (\$111,209) for technical assistance to local governments and nonprofit program recipients.

Not less than seventy percent (70%) of funds received by the State during the period of FFYs 2005, 2006 and 2007 will be used for project activities that benefit low and moderate income persons.

### **Interim/Short-Term Financing Grant Program**

Significant portions of the CDBG funds allocated to the State will remain unused for relatively long periods, even after these funds are committed by the State to eligible recipients for local projects. In order to maximize the use of these funds, which are available to the State under letters of credit from HUD, the State may choose to use these funds to provide grants to eligible recipients for interim or short-term financing of eligible economic development, housing and public facilities project activities which are consistent with the federal and State program goals and objectives. Program income or other funds paid to the State under the Interim/Short-Term Financing Grant Program will be used by the State to meet its other grant commitments to recipients. A recipient will be allowed to retain program income if it can be demonstrated to the satisfaction of the State that the program income is likely to be needed to finance projects of the same type and that there is adequate capacity to administer the funds.

Because the availability of funds for subsequent use depends on the payment of these funds from the initial user, there is some risk to subsequent users. This risk will be minimized through the use of irrevocable and unconditional letters of credit (to be required by recipients of borrowers, so that letter of credit proceeds will be available to the State through recipients) and/or other appropriate measures.

In reviewing proposals under the Interim/Short-Term Financing Grant Program, the State will consider:

- ❖ The proposed direct benefit of the project activities to low and moderate-income persons.
- ❖ The nature and extent of the effect of interim/short-term financing on project cost, feasibility and benefit, including the consequences of not providing a grant for the interim/short-term financing.
- ❖ The likelihood that program income or other funds will be available to the State in the amount and at the time proposed by the recipient so that the State will be able to meet its other grant commitments to recipients.
- ❖ If the interim/short-term assistance is to be provided to a private, for-profit entity to carry out an economic development project, the State will determine whether the assistance is "appropriate" (as required by federal statute, regulation and policy).

### **Regular Grant Program Funding**

The following amount of funds were set aside for the three major categories of projects and activities for the regular FFY 2007 grant program

	<u>Program Income</u>	<u>FFY07</u>
Business financing (through OEDIT)	\$0	\$ 3,562,431
Housing (through Local Affairs)	\$0	\$ 3,562,431
Public facilities/community development (through Local Affairs)		<u>\$ 3,562,432</u>
	<u>\$0</u>	\$10,687,294

More or less than these amounts for each project category may actually be awarded, depending on the relative quality of proposals received and on State and local priorities.

The state will provide information, upon request, for those communities interested in applying for guaranteed loans funds under Subpart M, the Section 108 Loan Guarantee program as well as give consideration to funding multi-year and/or multi-purpose applications.

#### **Maximum and Minimum Grant Amounts**

There are no absolute limits to the amount of funding an applicant may request. It is suggested for public facility/community development projects that \$500,000 be considered the maximum grant guideline. There is no suggested maximum for housing projects. There is no maximum limit for economic development projects. Suggested guidelines vary based on the use of funds.

#### **Review Process for Housing, Public Facilities, and Community Development Proposals**

Public facilities and community development proposals may be considered by the Department of Local Affairs periodically, on a continuous basis, during specified application periods or in conjunction with funding cycles established by the Department. Local government associations and regional organizations providing technical assistance to local governments will be advised of application opportunities.

The Department may end or defer consideration of public facilities/community development proposals when funds available have been exhausted or proposals are incomplete or premature.

The term "community development proposals" includes such projects as public improvements in downtown or other commercial areas, public and private non-profit tourist facilities and attractions, public and private non-profit business incubators, and rehabilitation of publicly and privately owned non-residential properties when such properties are integral parts of local government sanctioned and planned community redevelopment efforts, or when such properties are of key historic or commercial importance to a community or neighborhood.

Housing proposals will continue to be received and considered on a continuous basis by the Division of Housing using the same system outlined in the HOME program narrative. The Department may end or defer consideration of housing proposals when funds available have been exhausted and when proposals are incomplete or premature. Business development proposals involving the provision of financial assistance for private-for-profit and nonprofit businesses will be received and considered on a continuous basis by the Governor's Office of Economic Development and International Trade. Proposals will be evaluated by staff using the same three major factors as noted above for housing. The Governor's Financial Review Committee reviews business development proposals and makes final funding decisions.

Given the fact that HUD has targeted Chronic Homelessness, but has not provided additional funding, the Department of Local Affairs, Division of Housing will take aim at this target with CDBG funding. Given the limited Emergency Shelter funding available, DOH intends to increase the funding targeted to homelessness utilizing CDBG funds in *non-entitlement* areas, allowing us to expand ESG homeless efforts in

*entitlements.* Priority will be given to projects that are consistent with the following strategies.

- ❖ In order to develop a comprehensive approach to the provision of emergency shelter and delivery of services for the homeless, the first program priority is to ensure that applicant agencies are leveraging all resources, including local, state, federal and private funding in the operation of a shelter and/or delivery of related prevention and essential services.
- ❖ The second strategy is to ensure that applicants make a significant contribution to the elimination of homelessness as documented statistically.
- ❖ The third strategy is to encourage programs to use a coordinated, case management approach to service delivery. Programs utilizing strong case management approaches that ensure the delivery of essential services along the continuum of care will receive priority consideration for funding.
- ❖ The fourth strategy is to encourage homeless prevention through funding of programs that provide well thought out approaches to homelessness prevention.

Applicants for public facilities and community development projects (including all participants in multi-jurisdictional projects) are expected to prioritize all applications to the Department for CDBG funds. When submitted, housing, public facilities and community development proposals will be evaluated by Department staff on the following three major factors:

- ❖ Project Impact
- ❖ Public and Private Commitments
- ❖ Management Capability

No points are assigned, however, regional field and program staff review each application and a consensus is reached on level of funding recommendation. Applications are considered until all funding is committed. Recommendations range from full funding, high or low partial funding, to no funding.

The results of the staff review will be forwarded to the Executive Director of the Department of Local Affairs, who may consult with the State Housing Board or other advisory groups on the proposal. The consultation may be by telephone or mail, or may involve a meeting or hearing. Proposals for the continuation of existing housing rehabilitation/replacement projects will not be reviewed individually by an advisory body as long as acceptable performance is maintained, including performance in obtaining commitments of local cash and other public and private funds for their projects.

The Department Executive Director will consider staff reviews and any advisory committee recommendations and make the final funding decisions based on the project review factors.

In making funding decisions as well as decisions on proposed modifications to funded projects, the Department Executive Director may specify alternatives or changes as he deems necessary or appropriate, consistent with the project review factors. Alternatives and changes specified may include, but are not necessarily limited to: providing more or less funding than requested, proposed or recommended; adjusting project budget line items; providing funds for only selected activities within an

overall project; making a single award to two or more separate applicants so that projects can be undertaken on a multi-jurisdictional basis; changing terms, uses and conditions; and permitting projects to be amended to include additional, fewer or different project activities.

### **Review Process for Business Development Proposals for Private Businesses**

Business development proposals involving the provision of financial assistance for private for-profit and non-profit businesses (except for any financing to be provided by the Department of Local Affairs for "community development proposals," as previously described) will be received and considered on a continuous basis by the Colorado Governor's Office of Economic Development and International Trade (OEDIT). Such proposals include those which would provide funding through, local or regional loan funds, those which would provide infrastructure to benefit specific businesses and those which would provide feasibility/planning studies to benefit specific businesses.

The OEDIT may end or defer consideration of business financing proposals when funds available for award for such projects have been exhausted and when applications are incomplete or premature. Proposals will be evaluated by staff using the same three major factors as noted above for housing, public facilities, and community development proposals. The Colorado Governor's Financial Review Committee will review the economic development proposals and make final funding decisions.

### **Review Factors for All Public Facilities and Economic Development Proposals**

The following are the factors that will be used by staff in evaluating proposals. Under the various factors are listed many of the general and specific questions that may be asked, as appropriate, by staff in reviewing proposals and determining ratings.

**1. Project Impact.** The purpose of consideration of this factor is to determine the extent to which the community, particularly its low and moderate-income residents, will benefit from the proposed project.

**a. Benefit to Low and Moderate Income Persons**

For all projects, on an activity-by-activity and on a project-wide basis:

- What amount(s) of CDBG and non-CDBG funds will directly benefit low and moderate-income persons?
- What percentage(s) of CDBG and non-CDBG funds will directly benefit low and moderate-income persons?
- What number(s) of low and moderate-income persons will directly benefit from CDBG and non-CDBG funds?
- What percentage(s) of all persons directly benefited by CDBG and non-CDBG funds are low and moderate-income persons?
- What local application, hiring, and other procedures will be used to ensure that benefits projected to be provided to low and moderate income persons will actually be realized by such persons?
- How will the actual benefit to low and moderate-income persons be documented?
- Are the jurisdiction's projections or commitments with respect to low and moderate-income benefit realistic and attainable?

If the proposed project will increase operational costs, what will be the effect on

low and moderate-income persons? b. Extent and Urgency of the Need, and Extent to Which the Need is Addressed in a Timely Fashion

For all projects:

- What is the need to be addressed?
- How serious is the need?
- Is the public health or welfare threatened?
- What actions have previously been taken to remedy the problem?
- What are the results of these past actions?
- Have alternative means of addressing the need been adequately considered?
- What actions are proposed to meet the need?
- Are the proposed actions effective, efficient, appropriate, reasonable, and feasible?
- How does the proposed project differ from past efforts?
- Can the proposed activities be undertaken and completed in a reasonable period of time?
- What additional actions, in addition to the proposed CDBG project, may be necessary to meet the need?
- To what extent is the need met by the proposed project?
- What are the consequences of CDBG funds not being approved for the proposed project activities?
- Is resident and/or business displacement minimized? Are provisions made to assist persons involuntarily, permanently displaced?
- Will the project result in the demolition or conversion of dwelling units for the low- moderate-income persons?
- What measures are proposed to ensure that results to be achieved by the project will be adequately maintained in the future?
- If appropriate, has consideration been given and commitment made to recovering and reusing CDBG and other funds to continue efforts to address the need?

For projects including supportive human services activities (including job training and day care aspects of economic development projects):

- How are such activities critical to the accomplishment of overall objectives?
- Will CDBG funding supplant local, federal or State assistance available for activities?
- Is the requested CDBG assistance for such activities sufficient to complete the activities, or must the activities continue in order to achieve overall objectives?
- What percentage of total project costs will be spent on these activities?

For economic development projects:

- How many permanent jobs (both full-time and part-time) will be created and/or retained by the proposed project?
- Are the required factors used to determine that assistance to a private, for-profit entity "appropriate"?
- What types of permanent jobs will be created or retained?
- What effect will the proposed project have on the local tax base?
- Has adequate consideration been given to the relationships between job training needs, resources available, and the proposed project?
- When the proposed project involves public improvements in the central business district, are the proposed improvements being undertaken in designated slums or blighted areas?
- When the proposed project involves industrial sites and/or facilities, is a



prospect "in hand"?

For economic development projects that involve grants or business loan funds or loan guarantees:

- At what point will the full amount of the loan(s) be repaid, if applicable?
- Is the local selection process for grants, loans, and other forms of assistance open and equitable, and address the greatest needs to the extent feasible?

For site acquisition and/or other development projects:

- Does the site meet lender or other site selection standards?
- Are preliminary engineering/architectural designs or plans, specifications and cost estimates or studies completed? When will final plans, specifications and cost estimates be completed?
- Have proper studies been completed which demonstrate that there is a market for the proposed project and that it is financially feasible?

For public facilities projects:

- Is any attempt planned to recover any capital costs of public improvements assisted with CDBG funds?

If applicable, is the proposed project on the State Water or Sewer Needs Project Tracking List?

c. Consistency with Local Development Strategies and Coordination with Other Activities.

For all projects:

- How long has the proposed project been a priority or identified in an approved plan?
- What is the priority for the proposed project relative to other CDBG and Impact requests?
- Does the proposed project comply with, or not contradict, existing local planning regulations, such as zoning ordinances and subdivision regulations?
- How is the proposed project part of and consistent with an overall local capital improvements and maintenance plan and budget?
- If the community is included in an adopted development strategy or comprehensive plan for a larger geographic area, is the proposed project in conformance with, or not in contradiction to, such a strategy or plan?
- How long has the proposed project represented a documented need?
- To what extent does the proposed project complement, supplement or support other local, State or federal projects, programs or plans already in effect or to be implemented?
- Is there duplication of effort or overlap?
- To what extent does the proposed project further other related local projects or plans?
- If the proposed project lends itself to a multi-jurisdictional approach, has such a joint approach been adequately considered?
- When projects involve public improvements in the central business district, are downtown public improvements being undertaken in coordination with, or by a representative local economic development organization?

**2. Public and Private Commitments.** The purpose of consideration of this factor is to determine the extent of public and private commitments to the proposed project. Both the amount or value of commitments and the viability of commitments will be considered. Communities are strongly encouraged to take primary



responsibility for resolving their housing, economic development and public facilities problems. In specific projects this may involve making financial commitments; adjusting development regulations, user rates and fees, and capital construction and maintenance programs; creating improvement districts; establishing development and redevelopment authorities; and generally sharing in or leveraging funds and management for development and redevelopment.

a. Local Financial Commitments.

For all projects:

- To the extent of their abilities, have the local government, project participants and beneficiaries engaged and/or committed to engage generally in taxing efforts to address their own continuing development and maintenance needs?
- To the extent of their abilities, have the local government and local project participants and beneficiaries appropriated/committed funds specifically for the proposed project and/or committed to alter fees to ensure the success of the specific project?
- When the proposed project involves business loan funds or loan guarantees, what is the ratio of private and/or local public investment to the amount of CDBG funds requested? How was this determined?
- When the proposed project involves public improvements in the central business district, has the private sector demonstrated a commitment to reinvest (e.g., through formation of an improvement district or through committing to business loans)?
- When a proposed development project requires interim and/or permanent financing, is the needed financing firmly committed? If not, is there a conditional or preliminary commitment, and what is the likelihood that a firm commitment will be made?

b. Local Non-Financial Commitments.

For all projects:

- If necessary, has the community committed to alter local regulations to ensure the success of the project?
- Has the community made good faith efforts to involve residents, including low and moderate income persons and minorities, in assessing community needs and developing strategies to address its needs?
- Have the directly affected parties in the community demonstrated active support for the project?

c. Other Commitments

For all projects:

- Have any grant funds been sought for or committed to the proposed project?
- What are the sources, amounts and availabilities of these grant funds?

**3. Management Capability.** The purpose of consideration of this factor is to evaluate the ability of the local government submitting the proposal to administer the project as described.

a. Staff and Contractors.

For all projects:

- Does the local government have adequate and experienced programmatic and

- fiscal staff and contractors, or has the applicant thoroughly considered the types of staff and contractor experience and qualifications necessary to carry out the project, including extensive statutory and regulatory requirements?
- How have the local government and its contractors performed in the past in carrying out development and redevelopment activities, and any type of activity with extensive statutory and regulatory requirements?
- To what extent will local government staff be directly involved in project management?
- What criteria and procedures will be used for selecting contractors?
- Have the roles and responsibilities of project participants been clearly established?

For economic development projects:

- Has the local government established an advisory or decision-making committee knowledgeable in economic development matters including small business support, industrial recruiting, business loan funds, etc.?
- Does the jurisdiction have business management experience sufficient to review pro forma, cash flow statements and business plans? If not, how will these tasks be accomplished?

- b. Budget. Administrative costs as well as other costs will be compared with those of other similar proposals.

For all projects:

- Are the proposed administration and overall project budgets (including appropriate development and operating budgets in the case of development projects) adequate, reasonable and realistic given the project work plan?
- c. Statutory and Regulatory Compliance.
- Does the proposed project involve or result in residential displacement? If so, have all reasonable steps been taken to minimize displacement? Is there a plan to replace all low/moderate income housing demolished or converted, and to assist persons being relocated?
  - Does the proposed project involve real property acquisition or relocation of any persons or businesses? Are the Uniform Act requirements triggered? Are cost and time requirements reasonably estimated?
  - Have labor wage costs been reasonably estimated? (Especially, has the applicant considered whether the proposed project is subject to Davis-Bacon prevailing wage requirements?)
  - Is the proposed project in a floodplain or geological hazard area or does it affect cultural or historic resources? Are there other environmental considerations? If so, what mitigation measures are proposed and what alternatives have been considered?
  -

## **VI. Technical Assistance**

The State will continue a coordinated technical assistance program to assist communities in the areas of CDBG project management and project formulation and planning, particularly in coordination with State programs such as impact grants, housing grants and loans, emergency water and sewer grants, and economic development funds. Special project management technical assistance will be targeted to those communities that have never administered a CDBG grant, and to those that have experienced or are experiencing difficulty in administering a CDBG grant. Project formulation and planning assistance will be targeted to those communities that need more long-term technical assistance to prepare for CDBG or

other State funding in the future and that have committed to undertake overall development and maintenance planning and budgeting efforts. State technical assistance may be in the form of personal contact with local government officials and staff, workshops, brokering assistance from private or local public sources, and documents and materials. Staff have prepared a CDBG Guidebook which is available on-line at [www.dola.state.co.us/LGS/FA/cdbg.htm](http://www.dola.state.co.us/LGS/FA/cdbg.htm). The Guidebook contains information on Project Start-up, Financial Management, Reporting, Environmental Review, Civil Rights, Acquisition, Relocation, Labor and Construction, Project Close-Out, and Monitoring. All sections are available in PDF or Word format. This Guidebook is also given to grantees in hard copy at the time of award.

## **VII. Grantee Responsibilities**

As previously indicated, municipal and county governments are strongly encouraged to take primary responsibility for resolving housing and community development problems. In specific projects, this may involve adjusting development regulations, user rates and fees and capital construction and maintenance programs, creation of improvement districts, and generally sharing in or leveraging funds and management for development and redevelopment.

Also, local governments and project sponsors are strongly encouraged to use advisory committees in assessing needs and in formulating, implementing and modifying local development and redevelopment strategies. Use of such committees can often lend continuity and objectivity to the planning and development process. Additionally, jurisdictions submitting proposals and, as required, other project participants must comply with the following specific requirements by means of addressing the preceding "Review Factors" and providing specific certifications and statements:

1. Develop a community development program so as to give maximum feasible priority to activities that will benefit persons of low and moderate income or aid in the prevention or elimination of slums or blight. An applicant may also describe activities that the applicant certifies are designed to meet other community development needs that have arisen during the preceding 12-month period and have a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available.
2. Provide in a timely manner and as required, opportunities for citizen participation, hearings, and access to information with respect to its community development program, specifically including:
  - Furnishing citizens information concerning the amount of funds available for proposed community development and housing activities and the range of activities that may be undertaken, including the estimated amount proposed to be used for activities that will benefit persons of low and moderate income and its plans for minimizing displacement of persons as a result of activities assisted with CDBG funds and to assist persons actually displaced as a result of such activities;
  - Publishing a proposed project plan/application in such a manner to afford affected citizens an opportunity to examine its content and to submit comments on the proposed project plan/application and on the community development performance of the applicant;
  - Holding one or more public hearings to obtain the views of citizens on community development and housing needs;

- As applicable, providing citizens with reasonable access to records regarding its past use of CDBG funds;
  - In preparing its project plan/application, considering any such comments and views and, if deemed appropriate, modifying the proposed project plan/application;
  - Making the final project plan/application available to the public;
  - In the event it is awarded CDBG funds by the State, providing citizens with reasonable notice of, and opportunity to comment on, any substantial change proposed to be made in the use of CDBG funds from one eligible activity to another by following the same procedures required in this paragraph for the preparation and submission of the final project plan/application.
3. Follow a detailed citizen participation plan which:
    - Provides for and encourages citizen participation with particular emphasis on participation by persons of low and moderate income who are residents of slum and blight areas and of areas in which CDBG funds are proposed to be used;
    - Provides citizens with reasonable and timely access to local meetings, information, and records relating to its proposed and actual use of CDBG funds;
    - Provides for technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the applicant;
    - Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
    - Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and
    - Identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.
  4. Prior to submitting a proposal for funds, identify and document community development and housing needs, including the needs of low and moderate income persons, and the activities to be undertaken to meet such needs.
  5. Follow a residential anti-displacement and relocation assistance plan which shall in the event of such displacement, provide that:
    - Governmental agencies or private developers shall provide within the same community comparable replacement dwellings for the same number of occupants as could have been housed in the occupied and vacant habitable low and moderate-income dwelling units demolished or converted to a use other than for housing for low and moderate income persons, and provide that such replacement housing may include existing housing assisted with project based assistance provided under section 8 of the United State's Housing Act of 1937;
    - Such comparable replacement dwellings shall be designed to remain affordable to persons of low and moderate income for 10 years from the time of initial occupancy;
    - Relocation shall be provided for all low or moderate income persons who occupied housing demolished or converted to a use other than for low or

- moderate income housing, including reimbursement for actual and reasonable moving expenses, security deposits, credit checks, and other moving-related expenses, including any interim living costs; and, in the case of displaced persons of low and moderate income, provide either:
- Compensation sufficient to ensure that, for a 5-year period, the displaced families shall not bear, after relocation, a ratio of shelter costs to income that exceeds 30 percent; or
  - If elected by a family, a lump-sum payment equal to the capitalized value of the benefits available under sub-clause (I) to permit the household to secure participation in a housing cooperative or mutual housing association;
  - Persons displaced shall be relocated into comparable replacement housing that is for:
    - decent, safe, and sanitary;
    - adequate in size to accommodate the occupants;
    - functionally equivalent; and
    - in an area not subject to unreasonably adverse environmental conditions.
6. Will not plan or attempt to recover any capital costs of public improvements assisted in whole or in part with CDBG funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless (A) CDBG funds received are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than CDBG; or (B) for the purposes of assessing any amount against properties owned and occupied by persons of low and moderate income who are not persons of very low income, the grantee certifies to the State that it lacks sufficient funds received from the State to comply with the requirements of (A).
7. Conduct and administer its program in conformity with the Civil Rights Act of 1964 and The Fair Housing Act.
8. Complete a self-evaluation of its current policies and practices to determine whether they meet the requirements of Section 504 of the Rehabilitation Act of 1973 as amended and the HUD implementing regulations at 24 CFR Part 8.
9. Comply with other provisions of Title I of the Act and other applicable federal and State laws and regulations. (A summary of many of the federal laws and regulations is contained in Section VIII.)

Finally, it should be noted that, to the greatest extent permitted by federal law and regulations, it is the State's intent that the local governments' monitoring and evaluation of projects be in accordance with program and financial oversight responsibilities to their citizens under State statutes and fiscal rules. Principal matters for monitoring and evaluation will be project progress, financial management, subcontracts, documentation, project benefit to low and moderate income persons, and compliance with federal and State laws and regulations. The State may require quarterly financial and program performance reports, a completion performance report and other reports. An audit is required. Information requested will serve to provide the State with a basis for evaluation of grantee performance. In addition, the reports will provide additional assurance of compliance with applicable federal and State laws and regulations.

**VIII. Federal Laws and Regulations**  
**APPLICABLE TO THE STATE-ADMINISTERED COMMUNITY**  
**DEVELOPMENT BLOCK GRANT PROGRAM**

**National Environmental Policy Act of 1969** (42 USC 4321 et seq.), as amended, and the implementing regulations of HUD (24 CFR Part 58) and of the Council on Environmental Quality (40 CFR Parts 1500 - 1508) providing for establishment of national policy, goals, and procedures for protecting, restoring and enhancing environmental quality.

**National Historic Preservation Act of 1966** (16 USC 470 et seq.), as amended, requiring consideration of the effect of a project on any district, site, building, structure or object that is included in or eligible for inclusion in the National Register of Historic Places.

**Executive Order 11593, Protection and Enhancement of the Cultural Environment**, May 13, 1971 (36 FR 8921 et seq.) requiring that federally-funded projects contribute to the preservation and enhancement of sites, structures and objects of historical, architectural or archaeological significance.

**The Archaeological and Historical Data Preservation Act of 1974**, amending the Reservoir Salvage Act of 1960 (16 USC 469 et seq.), providing for the preservation of historic and archaeological data that would be lost due to federally-funded development and construction activities.

**Executive Order 11988, Floodplain Management, May 24, 1977** (42 FR 26951 et seq.) prohibits undertaking certain activities in flood plains unless it has been determined that there is no practical alternative, in which case notice of the action must be provided and the action must be designed or modified to minimize potential damage.

**Flood Disaster Protection Act of 1973** (42 USC 4001), placing restrictions on eligibility and acquisition and construction in areas identified as having special flood hazards.

**Executive Order 11990, Protection of Wetlands, May 24, 1977** (42 FR 26961 et seq.) requiring review of all actions proposed to be located in or appreciably affecting a wetland. Undertaking or assisting new construction located in wetlands must be avoided unless it is determined that there is no practical alternative to such construction and that the proposed action includes all practical measures to minimize potential damage.

**Safe Drinking Water Act of 1974** (42 USC 201, 300 et seq., 7401 et seq.), as amended, prohibiting the commitment of federal financial assistance for any project which the Environmental Protection Agency determines may contaminate an aquifer which is the sole or principal drinking water source for an area.

**The Endangered Species Act of 1973** (16 USC 1531 et seq.), as amended, requiring that actions authorized, funded, or carried out by the federal government do not jeopardize the continued existence of endangered and threatened species or result in the destruction or modification of the habitat of such species which is determined by the Department of the Interior, after consultation with the State, to be critical.

**The Wild and Scenic Rivers Act of 1968** (16 USC 1271 et seq.), as amended, prohibiting federal assistance in the construction of any water resources project that would have a direct and adverse affect on any river included in or designated for study or inclusion in the National Wild and Scenic Rivers System.



**The Clean Air Act of 1970** (42 USC 1857 et seq.), as amended, requiring that federal assistance will not be given and that license or permit will not be issued to any activity not conforming to the State implementation plan for national primary and secondary ambient air quality standards.

**HUD Environmental Criteria and Standards** (24 CFR Part 51), providing national standards for noise abatement and control, acceptable separation distances from explosive or fire prone substances, and suitable land uses for airport runway clear zones.

**Section 104(d) of the Housing and Community Development Act of 1974**, as amended (42 USC 5301), known as the "Barney Frank Amendment," and the HUD implementing regulations requiring that local grantees follow a residential anti-displacement and relocation assistance plan which provides for the replacement of all low/moderate income dwelling units that are demolished or converted to another use as a direct result of the use of CDBG funds, and which provides for relocation assistance for all low/moderate income households so displaced.

**Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970**, as amended -- Title III, Real Property Acquisition (Pub. L. 91-646 and HUD implementing regulations at 49 CFR Part 24), providing for uniform and equitable treatment of persons displaced from their homes, businesses, or farms by federal or federally-assisted programs and establishing uniform and equitable land acquisition policies for federal assisted programs. Requirements include bona fide land appraisals as a basis for land acquisition, specific procedures for selecting contract appraisers and contract negotiations, furnishing to owners of property to be acquired a written summary statement of the acquisition price offer based on the fair market price, and specified procedures connected with condemnation.

**Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970**, as amended -- Title II, Uniform Relocation Assistance (Pub. L. 91-646 and HUD implementing regulations at 49 CFR Part 24), providing for fair and equitable treatment of all persons displaced as a result of any federal or federally-assisted program. Relocation payments and assistance, last-resort housing replacement by displacing agency, and grievance procedures are covered under the Act. Payments and assistance will be made pursuant to State or local law, or the grant recipient must adopt a written policy available to the public describing the relocation payments and assistance that will be provided. Moving expenses and up to \$22,500 for each qualified homeowner or up to \$5,250 for each tenant are required to be paid.

**Davis-Bacon Fair Labor Standards Act** (40 USC 276a - 276a-5) requiring that, on all contracts and subcontracts which exceed \$2,000 for federally-assisted construction, alteration or rehabilitation, laborers and mechanics employed by contractors or subcontractors shall be paid wages at rates not less than those prevailing on similar construction in the locality as determined by the Secretary of Labor. (This requirement applies to the rehabilitation of residential property only if such property is designed for use of eight or more families.)

Assistance shall not be used directly or indirectly to employ, award contracts to, or otherwise engage the services of, or fund any subcontractor or subrecipient during any period of debarment, suspension, or placement in ineligibility status under the provisions of 24 CFR Part 24.

**Contract Work Hours and Safety Standards Act of 1962** (40 USC 327 et seq.) requiring that mechanics and laborers employed on federally-assisted contracts



which exceed \$2,000 be paid wages of not less than one and one-half times their basic wage rates for all hours worked in excess of forty in a work week.

**Copeland "Anti-Kickback" Act of 1934** (40 USC 276 (c)) prohibiting and prescribing penalties for "kickbacks" of wages in federally-financed or assisted construction activities.

**The Lead-Based Paint Poisoning Prevention Act -- Title IV** (42 USC 4831) prohibiting the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance, and requiring notification to purchasers and tenants of such housing of the hazards of lead-based paint and of the symptoms and treatment of lead-based paint poisoning.

**Section 3 of the Housing and Community Development Act of 1968** (12 USC 1701 (u)), as amended, providing that, to the greatest extent feasible, opportunities for training and employment that arise through HUD-financed projects, will be given to lower-income persons in the unit of the project area, and that contracts be awarded to businesses located in the project area or to businesses owned, in substantial part, by residents of the project area.

**Section 109 of the Housing and Community Development Act of 1974** (42 USC 5309), as amended, providing that no person shall be excluded from participation (including employment), denied program benefits or subjected to discrimination on the basis of race, color, national origin or sex under any program or activity funded in whole or in part under Title I (Community Development) of the Act.

**Title VI of the Civil Rights Act of 1964** (Pub. L. 88-352; 42 USC 2000 (d)) prohibiting discrimination on the basis of race, color, religion or religious affiliation, or national origin in any program or activity receiving federal financial assistance.

**The Fair Housing Act** (42 USC 3601-20), as amended, prohibiting housing discrimination on the basis of race, color, religion, sex, national origin, handicap and familial status.

**Executive Order 11246** (1965), as amended by Executive Orders 11375 and 12086, prohibiting discrimination on the basis of race, color, religion, sex or national origin in any phase of employment during the performance of federal or federally-assisted contracts in excess of \$2,000.

**Executive Order 11063** (1962), as amended by Executive Order 12259, requiring equal opportunity in housing by prohibiting discrimination on the basis of race, color, religion, sex or national origin in the sale or rental of housing built with federal assistance.

**Section 504 of the Rehabilitation Act of 1973** (29 USC 793), as amended, providing that no otherwise qualified individual shall, solely by reason of a handicap, be excluded from participation (including employment), denied program benefits or subjected to discrimination under any program or activity receiving federal funds.

**Age Discrimination Act of 1975**, (42 USC 6101), as amended, providing that no person shall be excluded from participation, denied program benefits or subjected to discrimination on the basis of age under any program or activity receiving federal funds.

**Armstrong/Walker "Excessive Force" Amendment**, (P.L. 101-144) & Section 906 of Cranston-Gonzalez Affordable Housing Act of 1990, requires that a recipient of HUD funds must certify that they have adopted or will adopt and enforce a policy

prohibiting the use of excessive force by law enforcement agencies within their jurisdiction against individuals engaged in nonviolent civil rights demonstration; or fails to adopt and enforce a policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstration within its jurisdiction.

**Government-wide Restriction on Lobbying**, (P.L. 101-121), prohibits spending CDBG funds to influence or attempt to influence federal officials; requires the filing of a disclosure form when non-CDBG funds are used for such purposes; requires certification of compliance by the state; and requires the state to include the certification language in grant awards it makes to units of general local government at all tiers and that all sub-recipients shall certify accordingly as imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to civil penalty of not less than \$10,000 and not more than \$100,000 for each failure.

**Department of Housing and Urban Development Reform Act of 1989** (24 CFR Part 12) requiring applicants for assistance for a specific project or activity from HUD, to make a number of disclosures if the applicant meets a dollar threshold for the receipt of covered assistance during the fiscal year in which an application is submitted. An applicant must also make the disclosures if it is requesting assistance from HUD for a specific housing project that involves assistance from other governmental sources.

X. DEFINITIONS - SLUMS AND BLIGHT

## State Statutory Definitions

"Slum area" means an area in which there is a predominance of buildings or improvements, whether residential or nonresidential, and which, by reason of dilapidation, deterioration, age or obsolescence, inadequate provision for ventilation, light, air, sanitation, or open spaces, high density of population and overcrowding, or the existence of conditions which endanger life or property by fire or other causes, or any combination of such factors, is conducive to ill health, transmission of disease, infant mortality, juvenile delinquency, or crime and is detrimental to the public health, safety, morals, or welfare. (31-25-103 C.R.S., 1973, as amended.)

"Blighted area" means an area which, by reason of the presence of a substantial number of slum, deteriorated, or deteriorating structures, predominance of defective or inadequate street layout, faulty lot layout in relation to size, adequacy, accessibility, or usefulness, unsanitary or unsafe conditions, deterioration of site or other improvements, unusual topography, defective or unusual conditions of title rendering the title non-marketable, or the existence of conditions which endanger life or property by fire and other causes, or any combination of such factors, substantially impairs or arrests the sound growth of the municipality, retards the provision of housing accommodations or constitutes an economic or social liability, and is a menace to the public health, safety, morals, or welfare in its present condition and use. (31-15-103 C.R.S., 1973, as amended)

## Federal Regulatory Definitions and Clarifications

Activities meeting the following criteria, in the absence of substantial evidence to the contrary, will be considered to aid in the prevention or elimination of slums or blight:

1. Activities to address slums or blight on an area basis. An activity will be considered to address prevention or elimination of slums or blight in an area if:
  - The area, delineated by the grantee, meets a definition of a slum, blighted,

- deteriorated or deteriorating area under State or local law;
- Throughout the area there is a substantial number of deteriorated or deteriorating buildings or the public improvements are in a general state of deterioration;
- Documentation is maintained by the grantee on the boundaries of the area and the condition which qualified the area at the time of its designation; and
- The assisted activity addresses one or more of the conditions that contributed to the deterioration of the area.

Rehabilitation of residential buildings carried out in an area meeting the above requirements will be considered to address the area's deterioration only where each such building rehabilitated is considered substandard under local definition before rehabilitation, and all deficiencies making a building substandard have been eliminated if less critical work on the building is undertaken. At a minimum, the local definition for this purpose must be such that buildings that it would render substandard would also fail to meet the housing quality standards for the Section 8 Housing Assistance Payments Program-Existing Housing (24 CFR 882.109).

2. Activities to address slums or blight on a spot basis. Acquisition, clearance, relocation, historic preservation and building rehabilitation activities that eliminate specific conditions of blight or physical decay on a spot basis not located in a slum or blighted area will meet this objective. Under this criterion, rehabilitation is limited to the extent necessary to eliminate specific conditions detrimental to public health and safety.

## **XI. ELIGIBLE ACTIVITIES**

Eligible activities and services under the Community Development Block Grant (CDBG) Program are those which:

- ❖ are consistent with the stated program goal and objectives; and
- ❖ are included as eligible activities under Section 105 of Title I of the Housing and Community Development Act of 1974 (the "Act"), as amended, and are otherwise eligible under other sections of Title I and under detailed federal regulations.

The following list of eligible activities is excerpted from Section 105(a) of Title I of the Act. (Emphasis has been added to facilitate its use.) HUD regulations further define and specify activities and services eligible under the CDBG program.

- (1) the acquisition of real property (including air rights, water rights, and other interests therein) which is
  - (A) blighted, deteriorated, deteriorating, underdeveloped, or inappropriately developed from the standpoint of sound community development and growth;
  - (B) appropriate for rehabilitation or conservation activities;
  - (C) appropriate for the preservation or restoration of historic sites, the beautification of urban land, the conservation of open spaces, natural resources, and scenic areas, the provision of recreational opportunities, or the guidance of urban development;
  - (D) to be used for the provision of public works, facilities, and improvements eligible for assistance under this title; or
  - (E) to be used for other public purposes;

- (2) acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation which promote energy efficiency) of public works, facilities (except buildings for the general conduct of government), and site or other improvements;
- (3) code enforcement in deteriorated or deteriorating areas in which such enforcement, together with public or private improvements or services to be provided, may be expected to arrest the decline of the area;
- (4) clearance, demolition, removal, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for rehabilitation, and rehabilitation of privately-owned properties and including the renovation of closed school buildings);
- (5) special projects directed to the removal of material and architectural barriers which restrict the mobility and accessibility of elderly and handicapped persons;
- (6) payments to housing owners for losses of rental income incurred in holding for temporary periods housing units to be utilized for the relocation of individuals and families displaced by activities under this title;
- (7) disposition (through sale, lease, donation, or otherwise) of any real property acquired pursuant to this title or its retention for public purposes;
- (8) provisions of public services, including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, homeless assistance, energy conservation, welfare or recreation needs, if such services have not been provided by the unit of general local government (through funds raised by such unit, or received by such unit from the State in which it is located) during any part of the twelve-month period immediately preceding the date of submission of the statement with respect to which funds are to be made available under this title, and which are to be used for such services, unless the Secretary finds that the discontinuation of such services was the result of events not within the control of the unit of general local government, except that not more than 15 percent of the amount of any assistance to a unit of general local government under this title may be used for activities under this paragraph unless such unit of general local government (or in the case of non-entitled communities not more than 15 percent statewide) used more than 15 percent of the assistance received under this title including program income for the previous fiscal year for such activities (excluding any assistance received pursuant to Public Law 98-8), in which case such unit of general local government may not use more than the percentage or amount of such assistance used for such activities for such fiscal year, whichever method of calculation yields the higher amount;
- (9) payment of the non-federal share required in connection with a federal grant-in-aid program undertaken as part of activities assisted under this title;
- (10) payment of the cost of completing a project funded under Title I of the Housing Act of 1949;
- (11) relocation payments and assistance for displaced individuals, families, businesses, organizations, and farm operations, when determined by the grantee to be appropriate;
- (12) activities necessary
  - (A) to develop a comprehensive community development plan, and
  - (B) to develop a policy-planning-management capacity so that the recipient of assistance under this title may more rationally and effectively
    - (i) determine its needs,

- (ii) set long-term goals and short-term objectives,
  - (iii) devise programs and activities to meet these goals and objectives,
  - (iv) evaluate programs and activities of such programs in accomplishing these goals and objectives, and
  - (v) carry out management, coordination, and monitoring of activities necessary for effective planning implementation;
- (13) payment of reasonable administrative costs related to establishing and administering federally approved enterprise zones and payment of reasonable administrative costs and carrying charges related to planning and execution of community development and housing activities, including the provision of information and resources to residents of areas in which community development and housing activities are to be concentrated with respect to the planning and execution of such activities, and including the carrying out of activities as described in section 701(e) of the Housing Act of 1954 on the date prior to the date of enactment of the Housing and Community Development Amendments of 1981;
- (14) provision of assistance including loans (both interim and long term) and grants for activities which are carried out by public or private nonprofit entities, including:
  - (A) acquisition of real property;
  - (B) acquisition, construction, reconstruction, rehabilitation, or installation of
    - (i) public facilities (except for buildings for the general conduct of government), site improvements, and utilities, and
    - (ii) commercial or industrial buildings or structures and other commercial or industrial real property improvements; and
  - (C) planning;
- (15) distance to neighborhood-based nonprofit organizations, local development corporations, nonprofit organizations serving the development needs of the communities of non-entitlement areas, or entities organized under section 301(d) of the Small Business Investment Act of 1958 to carry out neighborhood revitalization or community economic development or energy conservation project in furtherance of the objectives of section 101(c), and assistance to neighborhood-based nonprofit organizations, or other private or public nonprofit organizations, for the purpose of assisting, as part of neighborhood revitalization or other community development, the development of shared housing opportunities (other than construction of new facilities) in which elderly families (as defined in section 3(b)(3) of the United States' Housing Act of 1937) benefit as a result of living in a dwelling in which the facilities are shared with others in a manner that effectively and efficiently meets the housing needs of the residents and thereby reduces their cost of housing;
- (16) activities necessary to the development of energy use strategies, related to recipient's development goals, to assure that those goals are achieved with maximum energy efficiency, including items such as:
  - (A) an analysis of the manner in, and the extent to, which energy conservation objectives will be integrated into local government operations, purchasing and service delivery, capital improvements budgeting, waste management, district heating and cooling, land use planning and zoning, and traffic control, parking, and public transportation functions; and

- (B) a statement of the actions the recipient will take to foster energy conservation and the use of renewable energy resources in the private sector, including the enactment and enforcement of local codes and ordinances to encourage or mandate energy conservation or use of renewable energy resources, financial and other assistance to be provided (principally for the benefit of low- and moderate-income persons) to make energy conserving improvements to residential structures, and any other proposed energy conservation activities.
- (17) provision of assistance to private, for-profit entities, when the assistance is appropriate to carry out an economic development project (that shall minimize, to the extent practicable, displacement of existing businesses and jobs in neighborhoods) that-
  - (A) creates or retains jobs for low- and moderate-income persons;
  - (B) prevents or eliminates slums and blight;
  - (C) meets urgent needs;
  - (D) creates or retains businesses owned by community residents;
  - (E) assists businesses that provide goods or services needed by, and affordable to, low- and moderate-income residents; or
  - (F) provides technical assistance to promote any of the activities under (A) through (E).
- (18) the rehabilitation or development of housing assisted under Section 17 of the United States' Housing Act of 1937.
- (19) provision of assistance to facilitate substantial reconstruction of housing owned and occupied by low and moderate income persons
  - (A) where the need for the reconstruction was not determinable until after rehabilitation under this section had already commenced, or
  - (B) where the reconstruction is part of a neighborhood rehabilitation effort and the grantee
    - (i) determines the housing is not suitable for rehabilitation, and
    - (ii) demonstrates to the satisfaction of the Secretary that the cost of substantial reconstruction is significantly less than the cost of new construction and less than the fair market value of the property after substantial reconstruction.
- (20) provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities, which assistance shall not be considered a planning cost as defined in paragraph (12) or administrative cost as defined in paragraph (13).
- (21)
  - (A) housing services, such as housing counseling, energy auditing, preparation of work specifications, loan processing, inspections, tenant selection, management of tenant-based rental assistance, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in housing activities authorized under this section, or under Title II of the Cranston-



- Gonzalez National Affordable Housing Act, except that activities under this paragraph shall be subject to any limitation on administrative expenses imposed by any law;
- (B) lead-based paint evaluation and reduction as defined in Section 1004 of the Residential Lead-Based Paint Hazard reduction Act of 1992.
- (22) provision of assistance by recipients under this Title to institutions of higher education having a demonstrated capacity to carry-out eligible activities under this subsection for carrying out such activities.
  - (23) provision of assistance to public or private organizations, agencies, and other entities (including nonprofit and for-profit entities) to enable such entities to facilitate economic development by-
    - (A) providing credit (including providing direct loans and loan guarantees, establishing revolving loan funds, and facilitating peer lending programs) for the establishment, stabilization, and expansion of microenterprises;
    - (B) providing technical assistance, advise, and business support services (including assistance, advise, and support relating to developing business plans, securing funding, conducting marketing, and otherwise engaging in microenterprise activities) to owners of microenterprises and persons developing microenterprises; and
    - (C) providing general support (such as peer support programs and counseling) to owners of microenterprises and persons developing microenterprises.
  - (24) activities necessary to make essential repairs and to pay operating expenses necessary to maintain the habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration of such housing in primarily low and moderate income neighborhoods; and
  - (25) provision of direct assistance to facilitate and expand home ownership among persons of low and moderate income (except that such assistance shall not be considered a public service for purposes of paragraph 8) by using such assistance to-
    - (A) subsidize interest rates and mortgage principal amounts for low and moderate income homebuyers;
    - (B) finance the acquisition by low and moderate income homebuyers of housing that is occupied by the homebuyers;
    - (C) acquire guarantees for mortgage financing obtained by low and moderate income homebuyers from private lenders (except that amounts received under this title may not be used under this subparagraph to directly guarantee such mortgage financing and grantees under this title may not directly provide such guarantees);
    - (D) provide up to 50 percent of any down payment required from low and moderate income homebuyer; or
    - (E) pay reasonable closing costs (normally associated with the purchase of a home) incurred by low- and moderate-income homebuyers.
  - (26) provision of direct assistance to facilitate homeless services including operations, essential services and homeless prevention.
- The following is a provision affecting activity eligibility excerpted from Section 105 of Title I of the Act. (Section 105(d) was added to the Act by amendments enacted in 1983. Section 105(d) was added to the Act by amendments enacted in 1992.)
- (1) In any case in which an assisted activity described in paragraph (14) or (17) of subsection 105(a) is identified as principally benefiting persons of low and moderate income, such activity shall:



- (A) be carried out in a neighborhood consisting predominantly of persons of low and moderate income and provide services for such persons; or
- (B) involve facilities designed for use predominantly by persons of low and moderate income; or
- (C) involve employment of persons, a majority of whom are persons of low and moderate income.
- (D) for purposes of subsection (c)(1)(C):
  - (1) if an employee resides in, or the assisted activity through which he or she is employed, is located in a census tract that meets the federal enterprise zone eligibility criteria, the employee shall be presumed to be a person of low and moderate income; or
  - (2) if an employee resides in a census tract where not less than 70 percent of the residents have incomes at or below 80 percent of the area median, the employee shall be presumed to be a person of low and moderate income.
- (2) In any case in which an assisted activity described in subsection 105(a) is designed to serve an area generally and is clearly designed to meet identified needs of persons of low and moderate income in such area, such activity shall be considered to principally benefit persons of low and moderate income if not less than 51 percent of the residents of such area are persons of low and moderate income.
- (3) Any assisted activity under this title that involves the acquisition or rehabilitation of property to provide housing shall be considered to benefit persons of low and moderate income only to the extent such housing will, upon completion, be occupied by such persons.

The following is a provision affecting assistance to for-profit entities excerpted from Section 105(f) of Title I of the Act. (Section 105(f) was added to the Act by amendments enacted in 1992.)

In any case in which an activity described in paragraph (17) of subsection (A) is provided assistance such assistance shall not be limited to activities for which no other forms of assistance are available or could not be accomplished but for that assistance.

The following is a provision affecting micro-enterprise and small business program requirements excerpted from Section 105(g) of Title I of the Act. (Section 105(g) was added to the Act by amendments enacted in 1992.)

In developing program requirements and providing assistance pursuant to paragraph (17) of subsection (A) to micro-enterprise or small business, the Secretary shall:

- (1) take into account the special needs and limitations arising from the size of the entity; and
- (2) not consider training, technical assistance, or other support services costs provided to small business or microenterprises or to grantees and subgrantees to develop the capacity to provide such assistance, as a planning cost pursuant to section 105(a)(12) or an administrative cost pursuant to section 105(a)(13).

The following is a provision affecting activity eligibility excerpted from Section 104(b)(5) of Title I of the Act. (Section 104(b)(5) was added to the Act by amendments enacted in 1983.)

The grantee will not attempt to recover any capital costs of public improvements assisted in whole or part (with CDBG) funds by assessing any amount against

properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:

- (A) funds received (from the CDBG program) are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
- (B) for the purposes of assessing any amount against properties owned and occupied by persons of low and moderate income who are not persons of (low) income, the grantee certifies to the (State) that it lacks sufficient funds received under (the CDBG program) to comply with the requirements of subparagraph (A).

The following is a provision affecting lump-sum payments excerpted from Section 104(h) of Title I of the Act. (Section 104(h) was amended by the Cranston-Gonzalez National Affordable Housing Act of 1990.)

“Units of general local government receiving assistance under this title may receive funds, in one payment, in an amount not to exceed the total amount designated in the grant (or, in the case of a unit of general local government receiving a distribution from a State pursuant to section 106(d), not to exceed the total amount of such distribution) for use in establishing a revolving loan fund which is to be established in a private financial institution which is to be used to finance rehabilitation activities assisted under this title. Rehabilitation activities authorized under this section shall begin within 45 days after receipt of such payment and substantial disbursements from such fund must begin within 180 days after receipt of such payment.”

The following is a provision affecting program income excerpted from Section 104(j) of Title I of the Act. (Section 104(j) was amended per the 1992 Housing and Community Development Act.)

“Notwithstanding any other provision of law, any unit of general local government may retain any program income that is realized from any grant distributed by a state, under section 106 if (1) such income was realized after the initial disbursement of the funds received by such unit of general local government under such section; and (2) it will utilize the program income for eligible community development activities in accordance with the provisions of this title. A state may require as a condition of any amount distributed by such state under section 106(d) that a unit of general local government shall pay to such state any such income to be used by such state to fund additional eligible community development activities, except that such state shall waive such condition to the extent such income is applied to continue the activity from which such income was derived, except that the Secretary may, by regulation, exclude from consideration as program income any amounts determined to be so small that compliance with this subsection creates an unreasonable administrative burden on the unit of general local government.”

The following is a provision affecting Section 108 Loan Guarantee Authority excerpted from Section 108(d) of Title I of the Act. (Section 108(d)(2) of the Act was amended by the Cranston-Gonzalez National Affordable Housing Act of 1990.)

“To assist in assuring the repayment of notes, obligations and charges incurred under this section, a State shall pledge any grant for which the State may become eligible under this title as security for notes or other obligations and charges issued under this section in a non-entitlement area by any unit of general local government.

## Antipoverty Strategy

### 1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Based on the latest available U.S. Census reports, the number of people with incomes below the poverty line in Colorado was 388,952 in 2000, or 9.3% of the state's population. The number of persons living in poverty in Colorado has declined over the past decade. In 1990, the number was 375,214, which comprised 11.7% of the population. Since 1990, Colorado, like many other states, has changed its anti-poverty strategies to incorporate the changes brought about by the change in federal welfare programs.

Each Colorado county has the ability to design how it will administer TANF funds to help reduce poverty. The TANF system is highly dependent upon the TANF households receiving job training, housing, childcare, transportation, family health care, educational support and continuous employment. Providing training and employment opportunities to TANF recipients has been a challenge for many counties, especially those with limited job availability.

In accordance with federal requirements, the Colorado Works Program imposes a 60-month cumulative lifetime limit on the receipt of basic cash assistance and requires most adult recipients to be in a work activity within 24 months of being deemed job-ready.

Coordination of supportive services seems to be the key factor to assist families in escaping poverty. Federal agencies such as the Departments of Agriculture, Education, Health and Human Services, and Housing and Urban and Development are requesting that state departments plan and coordinate their supportive service programs and create a unified plan for requesting future block grant federal funding. In addition, local governments and non-profits are required to coordinate supportive services in their local areas in order to apply for new program funding. The coordinated effort of linking job training, education, employment opportunities, childcare, transportation, housing and food stamp benefits, it is hoped, will enable poverty stricken families to receive a full benefits package to assist them in getting off the welfare rolls.

Beyond the efforts to improve coordination, the Division has taken the lead in funding programs that can become models for communities throughout Colorado. In 2007 we will continue to fund our TBRA program for people who are homeless. Because the Division's funding is primarily discretionary, it is used as the catalyst for other supportive housing efforts. The Division of Housing can finance hard assets such as housing construction or rehabilitation, or soft costs such as rental subsidies. The direct impact of housing development is quality housing and additional construction jobs for a community.

Colorado Housing Finance Authority (CHFA) is also exploring ways of to provide low-interest and no-interest loans for housing development that serves families at 30% of AMI. The Division and CHFA, as well as other housing fund agencies, often coordinate their funding in order to make affordable housing projects successful. CHFA and CDH are also working in a collaborative manner to preserve affordable housing projects that have financial problems due to the economic slow down and resultant vacancy issues and intense market competition.

CDH received \$1,000,000 in Housing Development Grant funds for State fiscal year 2006 to be used for affordable housing, homeless shelters or transitional housing units. It is unknown to what extent the state legislature will allocate such funding in the future. When available, these state funds are the most flexible of the Division's funding, and allow tailored community solutions to help ensure that the poorest families in Colorado have an increasing supply of rental units affordable to them.

CDH believes that supportive services linked to housing are key to assist families in escaping poverty. CDH, Supportive Housing and Homeless Programs (SHHP) and the Colorado Interagency Council on Homelessness are working to better link housing for homeless persons who are working but coming out of shelters, with services that lead to independence. Services such as job training, education, employment, childcare, transportation, housing and food stamps will assist low-income families in achieving economic self-sufficiency.

A primary housing program that is designed to reduce dependency on public assistance is the Section 8 Family Self-Sufficiency (FSS) program. This program provides a framework and time line for reducing dependency on public assistance and is administered by the Colorado Division of Housing and Department of Human Services, Supportive Housing and Homeless Programs. It is offered locally by nonprofit housing agencies, housing authorities and service providers.

- ❖ The Colorado Division of Housing currently works with 11 FSS programs in Colorado and provides approximately \$60,000 to fund FSS-related staff. Between 125 and 140 families participate in the program. 70 families have current escrow accounts in various communities with the Division, and 126 individuals have successfully graduated.
- ❖ Many of the Division Section 8 contractors who administer the FSS programs have developed innovative ways to provide support to the families they serve. Two agencies have developed revolving emergency loan programs so that when a family is in need of funds for necessities, they can take out a low- or no-interest loan. One agency provides \$25 to \$50 incentives when an FSS client completes a GED, vocational or college course. Other innovative approaches exist.
- ❖ SHHP currently partners with seven local service providers in Colorado to provide an FSS program to 37 persons with disabilities and formerly homeless families. Seventeen families and individuals have current escrow accounts in various communities with SHHP, and 15 persons with disabilities have successfully graduated.

The Division of Housing also operates a Housing Choice Voucher Special Needs Program to coordinate organizations that provide supportive services. This program offers rental assistance to 75 families through the Homeless with Substance Abuse initiative. Five hundred disabled families receive rental assistance through independent living centers. Forty families receive assistance through the Colorado AIDS project; and 100 families in the Families Unification Program receive rental assistance, as well as 167 families who are homeless or at the risk of being homeless.

Although it is not a CDH program, it is important to note that the Department of Human Services (DHS) Supportive Housing and Homeless programs (SHHP)

administers a Section 8 rental subsidy for persons with disabilities and homeless families. SHHP partners with 60 local mental health centers, developmental disabilities service providers, independent living centers, homeless service providers, and county departments of human services to provide housing to persons with special needs. SHHP administers 2994 Section 8 vouchers for the special needs population, and 251 Shelter Plus Care vouchers for previously homeless persons with disabilities. Included in the SHHP programs are the following projects for special populations:

- ❖ 170 units for the Section 8 Welfare-to-Work program
- ❖ 100 Family Unification program vouchers for youth aging out of foster care,
- ❖ 50 Project Access vouchers to assist younger persons with disabilities in moving from institutions into the community;
- ❖ 50 Veterans Administration Supportive Housing vouchers that provide permanent housing to homeless veterans.

## **Non-HOMELESS SPECIAL NEEDS HOUSING (91.220 (c) & (e))**

### **1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.**

A CDH priority regarding non-homeless special needs housing is to assist in creating an adequate supply of housing for persons with special needs coupled with appropriate services to increase independence. (Special needs are defined as persons whose housing needs cannot be fully addressed without supportive services. Special populations are persons with physical disabilities, mental illness, developmental disabilities, people with AIDS and frail elderly persons). This is a high priority. CDH plans to assist at least 100 special need units.

#### **ANALYSIS**

Housing assistance for persons with special needs is a priority for the State of Colorado. Many of the lowest income persons in Colorado are those with special needs. Persons living on SSI or small social security checks cannot afford to pay market rents or market rates at assisted living facilities. An individual living on SSI IN Colorado would have to spend 92% of their income for an efficiency rental unit in Colorado. The Colorado Department of Human Services Supportive Housing and Homeless Programs office estimates that there are 10,276 persons with disabilities that need subsidized housing in Colorado.

Strategy	HUD Program Goal	HUD Objective	Outcome Statement	Indicator
<b><u>Long-Term Objective:</u></b> <b><i>Assist in creating an adequate supply of housing for persons with special needs coupled with services that increase independence</i></b>				
DH-1(4) Provide funding for permanent supportive housing units for the special populations	Creating a Suitable Living Environment	Accessibility	Accessibility for the purpose of providing suitable living environment	Number of homeless people assisted 2007 100 2008 100 2009 100

**2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.**

HOME, CDBG resources and State Housing Development Grants (if available) will assist in the creation of permanent supportive housing. CDH consults with the Colorado Housing Finance Authority (CHFA), HUD, Rural Development (RD) and faith-based housing development organizations to identify forthcoming projects: the project "pipeline". Coordination of resources for projects in the pipeline occurs on an ongoing basis to ensure appropriate cost-sharing of affordable housing projects. Additionally, CDH requires that local governments or community resources participate in such projects to the maximum extent possible.

## APPENDIX A

### ENERGY-EFFICIENT DESIGN AND CONSTRUCTION

#### Minimum Energy Code Requirement

Acquisition and rehabilitation and new construction projects funded with Colorado Division of Housing funds shall meet or exceed the Council of American Building Officials Model Energy Code, 1992 (CABO Model Energy Code, 1992), or, in the case of multifamily high rises, the requirements of the American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) Standard 90.1-1989. In Colorado, most local code jurisdictions have adopted the 2003 International Residential Code that incorporates and updates minimum codes noted above.

#### Energy Star Building Performance Standards

In 2002, U.S. Department of Housing and Urban Development (HUD) and the U.S. Environmental Protection Agency (EPA) entered into a memorandum of understanding to promote the use of Energy Star Building Performance Standards in HUD's affordable housing programs. The Colorado Division of Housing encourages the use of the Colorado Energy Star Standards Program in affordable housing projects. More information concerning the Colorado Energy Star Program can be found at <http://www.e-star.com/index.html>.

Applicants to CDOH are encouraged to incorporate the following language into design, construction and/or project engineering processes, "All new and acquisition/rehabilitation projects up to three stories shall be designed to meet the standard for *Energy Star Qualified New Homes* (80 or greater on the HERS Rating Scale). All procedures used for this rating shall comply with the National Home Energy Rating System guidelines." For projects greater than three stories in height, applicants to CDOH are encouraged to incorporate construction techniques that meet the requirements of *ASHRAE 90.1 Appendix G (2004 Revision)* plus 20 percent to be considered energy-efficient.

In the CDOH Application, indicate the number housing units that meet the Colorado Energy Star Standards Program criteria in the proposed project.

#### Energy Saving Partners (E\$P) New Construction Program

New construction affordable housing projects are eligible to participate in the Energy Saving Partners (E\$P) New Construction Program to receive grant funds for specific energy upgrades installed in the project. The List of specific energy upgrades can be found below. An Excel version of this information can be found at the CDOH website.

#### Energy Saving Partners (E\$P) Acquisition/Rehabilitation Program

Applicants to CDOH requesting funds for acquisition and rehabilitation housing projects are encouraged to contact the Energy Saving Partners (E\$P) Program concerning their involvement in the project. For more information please contact the E\$P Program at (303) 866-2084.



Housing Needs Table			Grantee:																					
			Only complete blue sections. Do NOT type in sections other than blue.																Households with a Disabled Member		Disproportionate Racial/Ethnic Need?	# of Households in lead-Hazard Housing	Total Low Income, HIV/AIDS Population	
Housing Needs - Comprehensive Housing Affordability Strategy (CHAS) Data Housing Problems			Current % of Households	Current Number of Households	3-5 Year Quantities												% of Goal	Priority Need?	Plan to Fund?	Fund Source				
					Year 1		Year 2		Year 3		Year 4*		Year 5*		Multi-Year						% HSHLD	# HSHLD		
					Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal				Actual			
Household Income <=30% MFI	Renter	Elderly	NUMBER OF HOUSEHOLDS	100%															100%					
			Any housing problems	1.0	24400					10		3		3		0	####	HIGH	Y			0		
			Cost Burden > 30%	62.8	15335											0	####							
			Cost Burden >50%	61.9	15100											0	####							
		Small Related	NUMBER OF HOUSEHOLDS																					
			With Any Housing Problems	1.0	32275					50		50		50		0	####	HIGH	Y					
			Cost Burden > 30%	81.1	26180											0	####							
			Cost Burden >50%	77.0	24865											0	####							
		Large Related	NUMBER OF HOUSEHOLDS																					
			With Any Housing Problems	1.0	8210					81		85		85		0	####	HIGH	Y					
			Cost Burden > 30%	92.1	7560											0	####							
			Cost Burden >50%	78.2	6420											0	####							
		All other hshld	NUMBER OF HOUSEHOLDS																					
			With Any Housing Problems	1.0	46660					80		80		80		0	####	HIGH	Y					
			Cost Burden > 30%	78.8	36770											0	####							
			Cost Burden >50%	77.7	36245											0	####							
	Owner	Elderly	NUMBER OF HOUSEHOLDS																					
			With Any Housing Problems	1.0	27433											0	####							
			Cost Burden > 30%	67.1	18418											0	####							
			Cost Burden >50%	66.6	18268											0	####							
		Small Related	NUMBER OF HOUSEHOLDS																					
			With Any Housing Problems	1.0	14995											0	####							
			Cost Burden > 30%	80.5	12075											0	####							
			Cost Burden >50%	78.1	11710											0	####							
		Large Related	NUMBER OF HOUSEHOLDS																					
			With Any Housing Problems	1.0	4110											0	####							
			Cost Burden > 30%	89.4	3675											0	####							
			Cost Burden >50%	80.4	3305											0	####							
		All other hshld	NUMBER OF HOUSEHOLDS																					
			With Any Housing Problems	1.0	14599					12		12		13		0	####	HIGH	Y					
			Cost Burden > 30%	76.7	11194											0	####							
			Cost Burden >50%	75.5	11024											0	####							

Household Income >30 to <=50% MFI																			
Owner	Elderly	NUMBER OF HOUSEHOLDS																100%	
		With Any Housing Problems	1.0	15033					50		55		50			0	####	HIGH	Y
		Cost Burden > 30%	60.6	9113												0	####		
		Cost Burden >50%	59.6	8958												0	####		
	Small Related	NUMBER OF HOUSEHOLDS																	
		With Any Housing Problems	1.0	33545					50		55		55			0	####	HIGH	Y
		Cost Burden > 30%	76.8	25765												0	####		
		Cost Burden >50%	70.0	23470												0	####		
	Large Related	NUMBER OF HOUSEHOLDS																	
		With Any Housing Problems	1.0	9280					192		192		192			0	####	HIGH	Y
		Cost Burden > 30%	86.1	7990												0	####		
		Cost Burden >50%	51.6	4790												0	####		
	All other hshol	NUMBER OF HOUSEHOLDS																	
		With Any Housing Problems	1.0	37485					444		444		444			0	####	HUGH	Y
		Cost Burden > 30%	77.4	29015												0	####		
		Cost Burden >50%	75.6	28340												0	####		
Renter	Elderly	NUMBER OF HOUSEHOLDS																	
		With Any Housing Problems	1.0	37543												0	####		
		Cost Burden > 30%	34.8	13063												0	####		
		Cost Burden >50%	34.3	12893												0	####		
	Small Related	NUMBER OF HOUSEHOLDS																	
		With Any Housing Problems	1.0	24275												0	####		
		Cost Burden > 30%	73.6	17860												0	####		
		Cost Burden >50%	71.2	17280												0	####		
	Large Related	NUMBER OF HOUSEHOLDS																	
		With Any Housing Problems	1.0	8569												0	####		
		Cost Burden > 30%	83.0	7114												0	####		
		Cost Burden >50%	67.3	5764												0	####		
	All other hshol	NUMBER OF HOUSEHOLDS																	
		With Any Housing Problems	1.0	14545					16		16		16			0	####	HIGH	Y
		Cost Burden > 30%	71.3	10370												0	####		
		Cost Burden >50%	70.4	10245												0	####		



**Jurisdiction****Housing Market Analysis***Complete cells in blue.*

Housing Stock Inventory	Vacancy Rate	0 & 1 Bedroom	2 Bedrooms	3+ Bedroom	Total	Substandard Units
<b><u>Affordability Mismatch</u></b>						
Occupied Units: Renter		214650	202540	124740	541930	
Occupied Units: Owner		50013	226375	839930	1116318	
Vacant Units: For Rent	6%	11605	14955	6150	32710	
Vacant Units: For Sale	2%	1865	6090	10995	18950	
Total Units Occupied & Vacant		278133	449960	981815	1709908	0
<b><u>Rents: Applicable FMRs (in \$s)</u></b>		663	832	1,178		
<b>Rent Affordable at 30% of 50% of MFI (in \$s)</b>			502	836		
<b>Public Housing Units</b>						
Occupied Units					0	
Vacant Units					0	
Total Units Occupied & Vacant		0	0	0	0	0
<b>Rehabilitation Needs (in \$s)</b>					0	

## Continuum of Care Homeless Population and Subpopulations Chart

Part 1: Homeless Population					Sheltered		Un-sheltered	Total	Jurisdiction											
					Emergency	Transitional			Data Quality											
1. Homeless Individuals					2137	1008	4531	7676	(N) enumerations ▼											
2. Homeless Families with Children					662	854	2248	3764												
	2a. Persons in Homeless with Children Families				1950	2625	7883	12458												
Total (lines 1 + 2a)					4087	3633	12414	20134												
Part 2: Homeless Subpopulations					Sheltered		Un-sheltered	Total	Data Quality											
1. Chronically Homeless					554		1295	1849	(N) enumerations ▼											
2. Severely Mentally Ill					1224		0	1224												
3. Chronic Substance Abuse					1091		0	1091												
4. Veterans					1126		0	1126												
5. Persons with HIV/AIDS					128		0	128												
6. Victims of Domestic Violence					1337		0	1337												
7. Youth (Under 18 years of age)					146		0	146												
Part 3: Homeless Needs Table: Individuals		Needs	Currently Available	Gap	5-Year Quantities										Total			Priority H. M. L.	Plan to Fund? Y N	Fund Source: CDBG, HOME, HOPWA, ESG or Other
					Year 1		Year 2		Year 3		Year 4		Year 5							
					Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Actual	% of Goal			
Beds	Emergency Shelters	1956	1702	254	31	0	31	0	31	0	31	0	31	124	31	25%	H	y	c	
	Transitional Housing	679	1171	-492	0	0	0	0	0	0	0	0	0	0	0	####	L	n	h,e	
	Permanent Supportive Housing	1640	1373	267	10	0	10	0	10	0	10	0	10	50	0	0%	H	y	h,e,a	
	Total	4275	4246	29	31	0	31	0	31	0	31	0	31	124	31	25%				
Chronically Homeless																				

Part 4: Homeless Needs Table: Families		Needs	Currently Available	Gap	5-Year Quantities										Total			<a href="#">Priority H, M, L</a>	<a href="#">Plan to Fund? Y N</a>	<a href="#">Fund Source: CDBG, HOME, HOPWA, ESG or Other</a>
					Year 1		Year 2		Year 3		Year 4		Year 5							
					Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Actual	% of Goal			
Beds	Emergency Shelters	2329	753	1576	62	0	62	0	62	0	62	0	0	62	248	62	25%	H	y	c
	Transitional Housing	3505	3029	476	25	0	25	0	25	0	25	0	0	25	100	25	25%	H	y	h,e
	Permanent Supportive Housing	1540	612	928	0	0	0	0	0	0	0	0	0	0	0	0	####	M	n	h,e,a
	Total	7374	4394	2980	87	0	87	87	0	0	87	0	0	87	261	174	67%			

Completing Part 1: Homeless Population. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The counts must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Completing Part 2: Homeless Subpopulations. This must be completed using statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time. The numbers must be from: (A) administrative records, (N) enumerations, (S) statistically reliable samples, or (E) estimates. The quality of the data presented in each box must be identified as: (A), (N), (S) or (E).

Sheltered Homeless. Count adults, children and youth residing in shelters for the homeless. "Shelters" include all emergency shelters and transitional shelters for the homeless, including domestic violence shelters, residential programs for runaway/homeless youth, and any hotel/motel/apartment voucher arrangements paid by a public/private agency because the person or family is homeless. Do not count: (1) persons who are living doubled up in conventional housing; (2) formerly homeless persons who are residing in Section 8 SRO, Shelter Plus Care, SHP permanent housing or other permanent housing units; (3) children or youth, who because of their own or a parent's homelessness or abandonment, now reside temporarily and for a short anticipated duration in hospitals, residential treatment facilities, emergency foster care, detention facilities and the like; and (4) adults living in mental health facilities, chemical dependency facilities, or criminal justice facilities.

Grantee Name: **Jurisdiction**

Non-Homeless Special Needs Including HOPWA		Needs	Currently Available	GAP	3-5 Year Quantities										Total		
					Year 1		Year 2		Year 3		Year 4*		Year 5*				
					Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Complete	Goal	Actual	% of Goal
Housing Needed	52. Elderly	41700	0	41700	60	0	60	0	50	0	50	0	50	0	270	0	0%
	53. Frail Elderly	12305	0	12305	20	0	20	0	60	0	60	0	60	0	220	0	0%
	54. Persons w/ Severe Mental Illness	2383	246	2137	25	0	25	0	25	0	25	0	25	0	125	0	0%
	55. Developmentally Disabled	20999	11129	9870	15	0	15	0	15	0	15	0	15	0	75	0	0%
	56. Physically Disabled	11504	0	11504	39	0	39	0	45	0	45	0	45	0	213	0	0%
	57. Alcohol/Other Drug Addicted	570	200	370	10	0	10	0	10	0	10	0	10	0	50	0	0%
	58. Persons w/ HIV/AIDS & their famili	325	117	208	125	0	125	0	125	0	125	0	125	0	625	0	0%
	59. Public Housing Residents	46080	31920	14160	0	0	0	0	0	0	0	0	0	0	0	0	####
	Total	135866	43612	92254	294	0	294	0	330	0	330	0	330	0	1578	0	0%
Supportive Services Needed	60. Elderly	10000		10000											0	0	####
	61. Frail Elderly	12305	516	11789											0	0	####
	62. Persons w/ Severe Mental Illness	2383	1566	817											0	0	####
	63. Developmentally Disabled	20999	11129	9870											0	0	####
	64. Physically Disabled	24954	13450	11504											0	0	####
	65. Alcohol/Other Drug Addicted	570	195	130	117		117		117		117		117		585	0	0%
	66. Persons w/ HIV/AIDS & their famili	325	117	#REF!	121	0	121	0	121	0	121	0	121	0	605	0	0%
	67. Public Housing Residents	46080	23096	22984											0	0	####
	Total	117616	50069	#REF!	238	0	238	0	238	0	238	0	238	0	1190	0	0%



Housing and Community Development Activities		Needs	Current	Gap	5-Year Quantities											
					Year 1		Year 2		Year 3		Year 4		Year 5		Cumulative	
					Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual	Goal	Actual
01 Acquisition of Real Property 570.201(a)		0	0	0					1		1		1		3	0
02 Disposition 570.201(b)		0	0	0											0	0
Public Facilities and Improvements	03 Public Facilities and Improvements (General) 570.201(c)	0	0	0					2		2		2		6	0
	03A Senior Centers 570.201(c)	0	0	0											0	0
	03B Handicapped Centers 570.201(c)	0	0	0											0	0
	03C Homeless Facilities (not operating costs) 570.201(c)	0	0	0					104		104		104		312	0
	03D Youth Centers 570.201(c)	0	0	0											0	0
	03E Neighborhood Facilities 570.201(c)	0	0	0					1		1		1		3	0
	03F Parks, Recreational Facilities 570.201(c)	0	0	0											0	0
	03G Parking Facilities 570.201(c)	0	0	0											0	0
	03H Solid Waste Disposal Improvements 570.201(c)	0	0	0											0	0
	03I Flood Drain Improvements 570.201(c)	0	0	0					1		1		1		3	0
	03J Water/Sewer Improvements 570.201(c)	0	0	0					5		5		5		15	0
	03K Street Improvements 570.201(c)	0	0	0					1		1		1		3	0
	03L Sidewalks 570.201(c)	0	0	0											0	0
	03M Child Care Centers 570.201(c)	0	0	0					2		2		2		6	0
	03N Tree Planting 570.201(c)	0	0	0											0	0
	03O Fire Stations/Equipment 570.201(c)	0	0	0											0	0
	03P Health Facilities 570.201(c)	0	0	0					1		1		1		3	0
	03Q Abused and Neglected Children Facilities 570.201(c)	0	0	0											0	0
	03R Asbestos Removal 570.201(c)	0	0	0					1		1		1		3	0
	03S Facilities for AIDS Patients (not operating costs) 570.201(c)	0	0	0											0	0
	03T Operating Costs of Homeless/AIDS Patients Programs	0	0	0											0	0
04 Clearance and Demolition 570.201(d)		0	0	0					1		1		1		3	0
04A Clean-up of Contaminated Sites 570.201(d)		0	0	0											0	0
Public Services	05 Public Services (General) 570.201(e)	0	0	0					5800		5600		5600		###	0
	05A Senior Services 570.201(e)	0	0	0											0	0
	05B Handicapped Services 570.201(e)	0	0	0											0	0
	05C Legal Services 570.201(e)	0	0	0											0	0
	05D Youth Services 570.201(e)	0	0	0											0	0
	05E Transportation Services 570.201(e)	0	0	0											0	0
	05F Substance Abuse Services 570.201(e)	0	0	0											0	0
	05G Battered and Abused Spouses 570.201(e)	0	0	0											0	0
	05H Employment Training 570.201(e)	0	0	0											0	0
	05I Crime Awareness 570.201(e)	0	0	0											0	0
	05J Fair Housing Activities (if CDBG, then subject to 570.201(e))	0	0	0					1		1				2	0
	05K Tenant/Landlord Counseling 570.201(e)	0	0	0											0	0
	05L Child Care Services 570.201(e)	0	0	0					5		5				10	0
	05M Health Services 570.201(e)	0	0	0											0	0

D	05N Abused and Neglected Children 570.201(e)	0	0	0											0	0
	05O Mental Health Services 570.201(e)	0	0	0											0	0
	05P Screening for Lead-Based Paint/Lead Hazards Poison 570.201(f)	0	0	0					1						1	0
	05Q Subsistence Payments 570.204	0	0	0											0	0
	05R Homeownership Assistance (not direct) 570.204	0	0	0					125		125		125		375	0
	05S Rental Housing Subsidies (if HOME, not part of 5% 570.204	0	0	0											0	0
	05T Security Deposits (if HOME, not part of 5% Admin c	0	0	0					10		10		10		30	0
	06 Interim Assistance 570.201(f)	0	0	0											0	0
	07 Urban Renewal Completion 570.201(h)	0	0	0											0	0
	08 Relocation 570.201(i)	0	0	0											0	0
	09 Loss of Rental Income 570.201(j)	0	0	0											0	0
	10 Removal of Architectural Barriers 570.201(k)	0	0	0											0	0
	11 Privately Owned Utilities 570.201(l)	0	0	0											0	0
	12 Construction of Housing 570.201(m)	0	0	0					245		245		245		735	0
	13 Direct Homeownership Assistance 570.201(n)	0	0	0					100		100		100		300	0
	14A Rehab: Single-Unit Residential 570.202	0	0	0					125		125		125		375	0
	14B Rehab: Multi-Unit Residential 570.202	0	0	0					25		25		25		75	0
	14C Public Housing Modernization 570.202	0	0	0					25		25		25		75	0
	14D Rehab: Other Publicly-Owned Residential Buildings 570.202	0	0	0											0	0
	14E Rehab: Publicly or Privately-Owned Commercial/Indu 570.202	0	0	0											0	0
	14F Energy Efficiency Improvements 570.202	0	0	0											0	0
	14G Acquisition - for Rehabilitation 570.202	0	0	0					350		350		350		1050	0
	14H Rehabilitation Administration 570.202	0	0	0					5		5		5		15	0
	14I Lead-Based/Lead Hazard Test/Abate 570.202	0	0	0											0	0
	15 Code Enforcement 570.202(c)	0	0	0											0	0
	16A Residential Historic Preservation 570.202(d)	0	0	0											0	0
	16B Non-Residential Historic Preservation 570.202(d)	0	0	0											0	0
	17A CI Land Acquisition/Disposition 570.203(a)	0	0	0					92		92		92		276	0
	17B CI Infrastructure Development 570.203(a)	0	0	0											0	0
	17C CI Building Acquisition, Construction, Rehabilitat 570.203(a)	0	0	0											0	0
	17D Other Commercial/Industrial Improvements 570.203(a)	0	0	0											0	0
	18A ED Direct Financial Assistance to For-Profits 570.203(b)	0	0	0					100		100		100		300	0
	18B ED Technical Assistance 570.203(b)	0	0	0											0	0
	18C Micro-Enterprise Assistance	0	0	0											0	0
	19A HOME Admin/Planning Costs of PJ (not part of 5% Ad	0	0	0					5		5		5		15	0
	19B HOME CHDO Operating Costs (not part of 5% Admin ca	0	0	0					5		5		5		15	0
	19C CDBG Non-profit Organization Capacity Building	0	0	0					1		1		1		3	0
	19D CDBG Assistance to Institutes of Higher Education	0	0	0											0	0
	19E CDBG Operation and Repair of Foreclosed Property	0	0	0											0	0
	19F Planned Repayment of Section 108 Loan Principal	0	0	0											0	0
	19G Unplanned Repayment of Section 108 Loan Principal	0	0	0											0	0
	19H State CDBG Technical Assistance to Grantees	0	0	0					2		2		2		6	0
	20 Planning 570.205	0	0	0					4		4		4		12	0
	21A General Program Administration 570.206	0	0	0					1		1		1		3	0

	21B Indirect Costs 570.206	0	0	0											0	0
	21D Fair Housing Activities (subject to 20% Admin cap) 570.206	0	0	0					1		1				2	0
	21E Submissions or Applications for Federal Programs 570.206	0	0	0											0	0
	21F HOME Rental Subsidy Payments (subject to 5% cap)	0	0	0											0	0
	21G HOME Security Deposits (subject to 5% cap)	0	0	0											0	0
	21H HOME Admin/Planning Costs of PJ (subject to 5% cap)	0	0	0					1		1		1		3	0
	21I HOME CHDO Operating Expenses (subject to 5% cap)	0	0	0					5		5		5		15	0
	22 Unprogrammed Funds	0	0	0											0	0
HOPWA	31J Facility based housing – development	0	0	0											0	0
	31K Facility based housing - operations	0	0	0											0	0
	31G Short term rent mortgage utility payments	0	0	0					17		17		17		51	0
	31F Tenant based rental assistance	0	0	0					75		75		75		225	0
	31E Supportive service	0	0	0											0	0
	31I Housing information services	0	0	0					20		20		20		60	0
	31H Resource identification	0	0	0					20		20		20		60	0
	31B Administration - grantee	0	0	0					1		1		1		3	0
	31D Administration - project sponsor	0	0	0					1		1		1		3	0
CDBG	Acquisition of existing rental units	0	0	0											0	0
	Production of new rental units	0	0	0											0	0
	Rehabilitation of existing rental units	0	0	0											0	0
	Rental assistance	0	0	0											0	0
	Acquisition of existing owner units	0	0	0											0	0
	Production of new owner units	0	0	0											0	0
	Rehabilitation of existing owner units	0	0	0											0	0
HOME	Homeownership assistance	0	0	0											0	0
	Acquisition of existing rental units	0	0	0											0	0
	Production of new rental units	0	0	0											0	0
	Rehabilitation of existing rental units	0	0	0											0	0
	Rental assistance	0	0	0					177		232		232		641	0
	Acquisition of existing owner units	0	0	0											0	0
	Production of new owner units	0	0	0											0	0
	Rehabilitation of existing owner units	0	0	0											0	0
	Homeownership assistance	0	0	0											0	0
	<b>Totals</b>	0	0	0	0	0	0	0	7465	0	7319	0	7312	0	###	0

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
PRESERVE HOMEOWNERSHIP FOR VERY-LOW, LOW- AND MODERATE INCOME  
HOUSEHOLDS THROUGH SINGLE FAMILY HOUSING REHAB**

**New Specific  
Objective**

Outcome/Objective Specific Annual Objectives		Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 Availability/Accessibility of Decent Housing</b>							
<b>DH-1(1)</b>	PROVIDE FUNDING FOR SINGLE-FAMILY, OWNER-OCCUPIED HOUSING REHAB TO PRESERVE ACCESSIBILITY OF DECENT HOUSING FOR VERY LOW-, LOW- AND MODERATE-INCOME HOUSEHOLDS	HOME	NUMBER OF SINGLE-FAMILY OWNER-OCCUPIED HOUSEHOLDS ASSISTED	2005			#DIV/0!
				2006			#DIV/0!
		CDBG		2007	125		0%
				2008	125		0%
				2009	125		0%
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
PRESERVE THE AVAILABILITY OF DECENT HOUSING THROUGH  
REHAB (ONLY) OF EXISTING UNITS**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 Availability/Accessibility of Decent Housing</b>							
<b>DH-1(2)</b>	FUND REHAB (ONLY) OF <u>EXISTING</u> AFFORDABLE HOUSING RENTAL MULTI- FAMILY PROJECTS INCLUDING EXPIRING SECTION 8 (BUT EXCLUDING SPECIAL NEEDS RENTAL HOUSING) TO TO PRESERVE THE AVAILABILITY OF DECENT HOUSING	CDBG	NUMBER OF UNITS ASSISTED	2005			#DIV/0!
				2006			#DIV/0!
		HOME		2007	60		0%
				2008	60		0%
		HDG (State)		2009	60		0%
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
HOUSING INFORMATION SERVICES AND RESOURCE IDENTIFICATION FOR PERSONS  
WITH HIV/AIDS TO ENSURE ACCESS TO DECENT HOUSING**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-1 Availability/Accessibiity of Decent Housing							
DH-1 (3)	PROVIDE FUNDING TO HIV/AIDS PROGRAMS FOR HOUSING INFORMATION SERVICES THAT HELP HIV/AIDS CLIENTS GAIN ACCESS TO DECENT HOUSING	HOPWA	NUMBER OF HOUSEHOLDS RECEIVING HOUSING INFORMATION	2005			#DIV/0!
				2006			#DIV/0!
				2007	10		0%
				2008	10		0%
				2009	10		0%
						0	#DIV/0!
			NUMBER OF HOUSEHOLDS RECEIVING RESOURCE IDENTIFICATION	2005			#DIV/0!
				2006			#DIV/0!
				2007	10		0%
				2008	10		0%
				2009	10		0%
		MULTI-YEAR GOAL				0	#DIV/0!
	PROVIDE FUNDING TO HIV/AIDS PROGRAMS FOR RESOURCE IDENTIFICATION TO HELP CLIENTS ACCESS DECENT HOUSING			2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
PERMANENT SUPPORTIVE HOUSING FOR SPECIAL NEEDS (EXCLUDING HOMELESS  
AND HIV/AIDS) TO ENSURE ACCESS TO DECENT HOUSING**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 Availability of Decent Housing</b>							
<b>DH-1(4)</b>	PROVIDE FUNDING FOR PERMANENT SUPPORTIVE HOUSING UNITS FOR SPECIAL NEEDS (EXCLUDING HOMELESS AND HIV/AIDS)	HOME	NUMBER OF UNITS	2005			#DIV/0!
				2006			#DIV/0!
		CDBG		2007	100		0%
				2008	100		0%
		COLORADO HDG		2009	100		0%
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!



**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
TRANSITIONAL HOUSING TO ENSURE THAT DECENT HOUSING  
IS ACCESSIBLE FOR THE HOMELESS**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 ACCESSIBILITY of Decent Housing</b>							
<b>DH-1(5)</b>	PROVIDE FUNDING TO CONSTRUCT OR RECONSTRUCT TRANSITIONAL HOUSING TO ENSURE THAT HOUSING IS AVAILABLE/ACCESSIBLE FOR THE HOMELESS	HOME	NUMBER OF UNITS ASSISTED	2005			#DIV/0!
				2006			#DIV/0!
		CDBG		2007		35	#DIV/0!
				2008		35	%
				2009		35	#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>105</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
RENTAL ASSISTANCE TARGETED TO HOMELESS OR HOPWA CLIENTS  
TO ENSURE ACCESSIBILITY TO DECENT HOUSING**

FUND



**New Specific  
Objective**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-1    Accessibility of Decent Housing							
DH-1(6)	PROVIDE FUNDING FOR RENTAL ASSISTANCE TARGETED TO HOMELESS PERSONS OR HOPWA CLIENTS TO ENSURE ACCESSIBILITY TO DECENT HOUSING	HOME	NUMBER OF HOUSEHOLDS ASSISTED	2005			#DIV/0!
				2006			#DIV/0!
				2007	250		0%
				2008	250		0%
				2009	250		0%
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
CONDUCT AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 Accessibility of Decent Housing</b>							
<b>DH-1(7)</b>	CONDUCT AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING TO ENSURE THAT DECENT HOUSING IS ACCESSIBLE	HOME	NUMBER OF ORGANIZATIONS PARTICIPATING	2005			#DIV/0!
				2006			#DIV/0!
		CDBG		2007	10		0%
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
	Specific Annual Objective			2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES**  
**INCREASE THE SUPPLY OF MULTIFAMILY AFFORDABLE RENTAL DEVELOPMENT**  
**THROUGH NEW CONSTRUCTION THAT INCREASES AFFORDABILITY**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-2 Affordability of Decent Housing</b>							
<b>DH-2(1)</b>	PROVIDE FUNDING FOR <u>NEW CONSTRUCTION OF RENTAL UNITS</u> TO CREATE DECENT, AFFORDABLE HOUSING	HOME	NUMBER OF UNITS ASSISTED	2005			#DIV/0!
				2006			#DIV/0!
		CDBG		2007	500		0%
				2008	500		0%
		STATE HDG		2009	500		0%
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			0%
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
	Specific Annual Objective			2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
PROVIDE FUNDING FOR ACQUISITION AND REHAB OF RENTAL  
UNITS TO ENSURE THAT HOUSING IS AFFORDABLE**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-2    Affordability of Decent Housing							
DH-2(2)	PROVIDE FUNDING FOR <u>ACQUISITION AND REHAB OF RENTAL UNITS</u> TO CREATE DECENT AFFORDABLE HOUSING	CDBG	NUMBER OF UNITS ASSISTED	2005			#DIV/0!
				2006			#DIV/0!
		HOME		2007	350		#REF!
				2008	350		0%
		HDG (State)		2009	350		0%
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES**  
**PROVIDE FUNDING FOR RENTAL ASSISTANCE TARGETED TO SPECIAL NEEDS**  
**FAMILIES BELOW 30%AMI TO ENSURE THAT HOUSING IS AFFORDABLE**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-2 Affordability of Decent Housing</b>							
<b>DH-2(3)</b>	FUND RENTAL ASSISTANCE TARGETED TO SPECIAL NEEDS FAMILIES BELOW 30% AMI, TO ENSURE THAT HOUSING IS AFFORDABLE	HOME	NUMBER OF SPECIAL NEEDS HOUSEHOLDS RECEIVING RENTAL ASSISTANCE	2005			#DIV/0!
				2006			#DIV/0!
		HOPWA		2007	50		0%
				2008	50		0%
				2009	50		0%
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
HOMEOWNERSHIP FOR LOW-, MODERATE-INCOME HOUSEHOLDS AND MINORITIES TO  
INCREASE AFFORDABILITY OF DECENT HOUSING**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-2 Affordability of Decent Housing</b>							
DH-2(4)	FUND HOMEOWNERSHIP OPPORTUNITIES FOR LOW-AND MODERATE-INCOME HOUSEHOLDS AND MINORITIES TO INCREASE AFFORDABILITY OF DECENT HOUSING	HOME	NUMBER OF HOUSEHOLDS ASSISTED	2005			#DIV/0!
				2006			#DIV/0!
		ADDI		2007	200		0%
				2008	200		0%
		CDBG		2009	200		0%
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
	Specific Annual Objective			2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!



**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
PROVIDE FUNDING FOR HOMELESS PREVENTION ACTIVITIES  
TO ENSURE THAT DECENT HOUSING IS AFFORDABLE**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-2 Affordability of Decent Housing</b>							
<b>DH-2(5)</b>	PROVIDE FUNDING FOR HOMELESS PREVENTION ACTIVITIES THROUGHOUT THE STATE TO ENSURE THAT DECENT HOUSING IS AFFORDABLE	ESG	NUMBER OF PERSONS AVOIDING HOMELESSNESS	2005			#DIV/0!
				2006			#DIV/0!
		CDBG		2007	600		0%
				2008	600		0%
		HOPWA		2009	600		0%
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!

**New Specific  
Objective**

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
PREVENT FORECLOSURE TO ENSURE THAT DECENT HOUSING IS SUSTAINABLE**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
DH-3 Sustainability of Decent Housing							
DH-3 (1)	FUND FORECLOSURE PREVENTION TO SUSTAIN DECENT HOUSING	CDBG	NUMBER OF HOUSEHOLDS ASSISTED WITH FORECLOSURE PREVENTION COUNSELING	2005			#DIV/0!
				2006			#DIV/0!
				2007	1000		0%
				2008	1000		0%
				2009	1000		0%
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
ESSENTIAL, SUPPORTIVE SERVICES FOR THE HOMELESS TO CREATE OR RETAIN  
ACCESSIBILITY TO A SUITABLE LIVING ENVIRONMENT**

TABLE

**New Specific  
Objective**

SPECIFIC  
S:

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed	
SL-1 Availability/Accessibility of Suitable Living Environment								
SL-1 (1)	FUND ESSENTIAL SUPPORTIVE SERVICES AND SHELTER OPERATIONS TO INCREASE OR RETAIN ACCESSIBILITY TO A SUITABLE LIVING ENVIRONMENT FOR HOMELESS PERSONS	ESG	NUMBER OF PEOPLE ASSISTED	2005			#DIV/0!	
				2006			#DIV/0!	
		CDBG		2007	4000		0%	
				2008	4000		0%	
		HOPWA		2009	4000		0%	
			MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!	
				2006			#DIV/0!	
				2007			#DIV/0!	
				2008			#DIV/0!	
				2009			#DIV/0!	
			MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!	
				2006			#DIV/0!	
				2007			#DIV/0!	
				2008			#DIV/0!	
				2009			#DIV/0!	
			MULTI-YEAR GOAL				0	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES**  
**CREATE OR RETAIN SHELTER HOUSING BEDS TO CREATE ACCESS TO A SUITABLE LIVING ENVIRONMENT**

**New Specific Objective**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>SL-1 Affordability of Decent Housing</b>							
<b>SL-1(2)</b>	PROVIDE FUNDING THAT CREATES OR PRESERVES SHELTER IN ORDER TO INCREASE ACCESSIBILITY TO A SUITABLE LIVING ENVIRONMENT	CDBG	NUMBER OF SHELTER TRANSITIONAL BEDS (UNITS) CREATED	2005			#DIV/0!
				2006			#DIV/0!
		HOME		2007	25		0%
				2008	25		0%
				2009	25		0%
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
			<b>MULTI-YEAR GOAL</b>			<b>0</b>	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
PERMANENT HOUSING FOR CHRONICALLY HOMELESS TO  
INCREASE AVAILABILITY OF SUITABLE LIVING ENVIRONMENT**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
SL-3    Suitable Living Environment							
SL-1(3)	Specific Objective	HOME	NUMBER OF UNITS ASSISTED	2005			#DIV/0!
				2006			#DIV/0!
		CDBH		2007	25		0%
				2008	25		0%
		HDG		2009	25		0%
		MULTI-YEAR GOAL				0	#DIV/0!
		Source of Funds #1		2005			#DIV/0!
				2006			#DIV/0!
		Source of Funds #2		2007			#DIV/0!
				2008			#DIV/0!
	Source of Funds #3	2009			#DIV/0!		
	MULTI-YEAR GOAL				0	#DIV/0!	
		Source of Funds #1		2005			#DIV/0!
				2006			#DIV/0!
		Source of Funds #2		2007			#DIV/0!
				2008			#DIV/0!
		Source of Funds #3		2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
FUND PROPERTY ACQUISITION FOR USE AS PUBLIC FACILITY  
TO CREATE A SUITABLE LIVING ENVIRONMENT**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
SL-3 Sustainability of a Suitable Living Environment							
SL-3(1)	FUND ACQUISITION OF PROPERTY FOR USE AS PUBLIC FACILITY TO HELP CREATE OR MAINTAIN A SUITABLE LIVING ENVIRONMENT	CDBG	NUMBER OF PERSONS BENEFITED AS A RESULT OF THE PLANNING	2005			#DIV/0!
				2006			#DIV/0!
				2007	1000		0%
				2008	1000		0%
				2009	1000		0%
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!

**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES**  
**PROVIDE FUNDING FOR PUBLIC FACILITIES THAT PRIMARILY BENEFIT LOW-MODERATE INCOME PERSONS**

**New Specific Objective**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
SL-3 Sustainability of Suitable Living Environment							
SL-3(2)	PROVIDE FUNDING FOR CONSTRUCTION OR RECONSTRUCTION OF PUBLIC FACILITIES THAT PRIMARILY BENEFIT LOW-MODERATE INCOME PERSONS	CDBG	NUMBER OF PERSONS SERVED AS A RESULT OF THE PUBLIC FACILITY IMPORVEMENTS OR CONSTRUCTION	2005			#DIV/0!
				2006			#DIV/0!
				2007	15000		0%
				2008	15000		0%
				2009	15000		0%
		MULTI-YEAR GOAL				0	#DIV/0!
			NUMBER OF PUBLIC FACILITIES CONSTRUCTED OR IMPROVED	2005			#DIV/0!
				2006			#DIV/0!
				2007	8		0%
				2008	8		0%
				2009	8		0%
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!



**TABLE 3A SUMMARY OF SPECIFIC ANNUAL OBJECTIVES  
PROVIDE FUNDS FOR PLANNING AND CAPACITY BUILDING RELATED TO  
INFRASTRUCTURE AND CAPITAL IMPROVEMENTS**

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
SL-3 Sustainability of Suitable Living Environment							
SL-3(3)	PROVIDE FUNDS FOR PLANNING AND CAPACITY BUILDING RELATED TO INFRASTRUCTURE AND CAPITAL IMPROVEMENTS	CDBG	NUMBER OF PERSONS BENEFITING AS A RESULT OF THE PLANNING	2005			#DIV/0!
				2006			#DIV/0!
				2007	1000		0%
				2008	1000		0%
				2009	1000		0%
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!

**TABLE 3A SPECIFIC ANNUAL OBJECTIVES**  
**ECONOMIC DEVELOPMENT ACTIVITIES THAT FOCUS ON CREATING OR SUSTAINING JOBS**

FUND

**New Specific  
Objective**

Specific Obj. #	Outcome/Objective  Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
EO-3 Sustainability of Economic Opportunity							
EO-3(1)	FUND ECONOMIC DEVELOPMENT ACTIVITIES THAT FOCUS ON CREATING OR SUSTAINING JOBS	CDBG	JOBS RETAINED OR CREATED	2005			#DIV/0!
				2006			#DIV/0!
				2007	200		0%
				2008	200		0%
				2009	200		0%
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!
				2005			#DIV/0!
				2006			#DIV/0!
				2007			#DIV/0!
				2008			#DIV/0!
				2009			#DIV/0!
		MULTI-YEAR GOAL				0	#DIV/0!



# CPMP State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

- |                                     |  |
|-------------------------------------|--|
| <input type="checkbox"/>            | <b>This certification does not apply.</b>                                |
| <input checked="" type="checkbox"/> | <b>This certification is applicable. See signature on the last page.</b> |

## STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
  - a. The dangers of drug abuse in the workplace;
  - b. The grantee's policy of maintaining a drug-free workplace;
  - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
  - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
  - a. Abide by the terms of the statement; and
  - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted –
  - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

**Anti-Lobbying** -- To the best of the state's knowledge and belief:

## Jurisdiction

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1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of State** -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

\_\_\_\_\_  
Signature/Authorized Official

2/10/2007

Date

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Name

Executive Director

Title

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Address

Denver, CO 80203

City/State/Zip

(303) 866-4904

Telephone Number

<input type="checkbox"/> This certification does not apply. <input checked="" type="checkbox"/> This certification is applicable. See signature on the last page.
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### Specific CDBG Certifications

The State certifies that:

**Citizen Participation --** It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

**Consultation with Local Governments --** It has or will comply with the following:

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

**Local Needs Identification --** It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

**Community Development Plan --** Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

**Use of Funds --** It has complied with the following criteria:

1. **Maximum Feasible Priority** - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit** - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2005, 2006, 2007, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments** - The state will require units of general local government that receive CDBG funds to certify to the following:

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed

## Jurisdiction

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by a source other than CDBG funds.

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force --** It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws --** The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Compliance with Laws --** It will comply with applicable laws.

\_\_\_\_\_  
Signature/Authorized Official

2/07/2007  
Date

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☐ This certification does not apply.  
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### Specific HOME Certifications

The State certifies that:

**Tenant Based Rental Assistance --** If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

**Eligible Activities and Costs --** It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Appropriate Financial Assistance --** Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

\_\_\_\_\_  
Signature/Authorized Official

2/10/2007  
Date

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☐ This certification does not apply.  
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### HOPWA Certifications

The State HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

\_\_\_\_\_  
Signature/Authorized Official

2/10/2007

Date

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Name

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<input type="checkbox"/> <b>This certification does not apply.</b> <input checked="" type="checkbox"/> <b>This certification is applicable. See signature on the last page.</b>
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## ESG Certifications

The Emergency Shelter Grantee certifies that:

1. The requirements of 24 *CFR* 576.21(a)(4) which provide that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services meet the following standards: (A) that the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) that the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) that there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) that the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
2. The requirements of 24 *CFR* 576.25(b)(2) concerning the submission by nonprofit organizations applying for funding of a certification of approval of the proposed project(s) from the unit of local government in which the proposed project is located.
3. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grant funds are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services, concerning the population to be served.
4. The building standards requirement of 24 *CFR* 576.55.
5. The requirements of 24 *CFR* 576.56, concerning assistance to the homeless.
6. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable Federal law concerning nondiscrimination and equal opportunity.
7. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
8. The requirements of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
9. (9) The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the Emergency Shelter Grants Program and that the address or location of any family violence shelter project assisted with ESG funds will not be made public, except with written authorization of the person or persons responsible for the operation of the shelter.
10. The requirement of that recipients involve, to the maximum extent practicable, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 576.56(b)(2).
11. The new requirement of the McKinney Act (42 *USC* 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that State and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of State and local resources.

I certify that the State will comply with the requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act of 1988.

## Jurisdiction

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I certify that the State will comply with the provisions of, and regulations and procedures applicable under 24 *CFR* 576.57(e) with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related authorities as specified in 24 *CFR* Part 58 as applicable to activities of nonprofit organizations funded directly by the State. The State also agrees to assume the Department's responsibility and authority as set forth in 24 *CFR* 576.57(e) for acting on the environmental certifications and requests for the release of funds submitted to the State by local government recipients.

I certify that the State will ensure the provision of the matching funds required by 24 *CFR* 576.51 and 42 *USC* 11375, including a description of the sources and amounts of such supplemental funds, as provided by the State, units of general local government or nonprofit organizations.

I further certify that the submission of a complete and approved Consolidated Plan with its relevant certifications, which is treated as the application for an Emergency Shelter Grant, is authorized under State law, and that the State possesses legal authority to fund the carrying out of grant activities by units of general local government and nonprofit organizations in accordance with applicable laws and regulations of the Department of Housing and Urban Development.

\_\_\_\_\_  
Signature/Authorized Official

2/7/2007

Date

\_\_\_\_\_  
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- ☐ This certification does not apply.
- ☒ This certification is applicable. See signature on the last page.

## APPENDIX TO CERTIFICATIONS

### Instructions Concerning Lobbying and Drug-Free Workplace Requirements

#### Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code)  
Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip
Centennial Building	1313 Sherman St.	Denver	Denver	CO	80203
Various Locations		ALL	All	CO	All

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:
  - i. All "direct charge" employees;
  - ii. all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and

## Jurisdiction

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- iii. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan

	2/10/2007
Signature/Authorized Official	Date

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